



**United States Department of the Interior  
BUREAU OF LAND MANAGEMENT**

Carson City Field Office  
Carson City, Nevada



January 2001

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**FINAL**

**SOUTHERN WASHOE COUNTY URBAN INTERFACE**

**PLAN AMENDMENT**



## United States Department of the Interior

### Bureau of Land Management

Carson City Field Office  
5665 Morgan Mill Road  
Carson City, Nevada 89701  
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JAN 11 2001

In Reply Refer To:  
1610 (NV030)

Dear Reader:

In the Fall of 1998 the Bureau of Land Management (BLM), Carson City Field Office and Washoe County invited you and other interested citizens to assist us in developing a plan for management of public lands in the southern Washoe County urban interface area. The comments we received from agencies, organizations, and individuals assisted in the preparation of the Proposed Southern Washoe County Urban Interface Plan Amendment and Environmental Assessment that was issued in August 2000. The comments on the proposed plan amendment helped us complete this final document.

The final plan amendment was developed jointly with Washoe County to be consistent with local land use master plans. The plan amendment is intended to improve the management of public lands and resources and to protect the long term quality of the human environment in the southern Washoe County urban interface.

I would like to thank those of you who gave us your comments and suggestions. If you have any questions on the implementation of this plan you are welcome to call or visit the Carson City Field Office at (775) 885-6000, 5665 Morgan Mill Road, Carson City, NV 89701.

Sincerely,

John Singlaub  
Manager  
Carson City Field Office

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# **SOUTHERN WASHOE COUNTY URBAN INTERFACE FINAL PLAN AMENDMENT**

## **INTRODUCTION**

### **PURPOSE AND NEED**

The purpose of this amendment to the Lahontan Resource Management Plan (RMP) is to provide for improved management of public lands in the Reno and Sparks metropolitan area. The amendment is intended to identify areas where public lands would be retained in ownership by the people of the United States; areas where public lands would be available for acquisition by State or local agencies or the private sector; areas appropriate for acquisition by the BLM; and how public lands would be managed.

The Land Use Master Plans of Reno, Sparks, and Washoe County, and the Washoe County Regional Open Space Plan define and delineate open space in southern Washoe County. Open Space in Washoe County is defined as: *Undeveloped land that encompasses natural, scenic, cultural, and recreational resources important to the local quality-of-life.* A large portion of the lands described in the above plans as being consistent with open space values are public lands managed by the Bureau of Land Management (BLM) Carson City Field Office.

The amendment is needed to protect the long term quality of the human environment in the southern Washoe County urban interface. These public lands are an important natural resource for open space for the people of the Reno/Sparks metropolitan area.

All other uses of public land, not addressed in this plan amendment, will continue to be managed as provided for in the existing Lahontan Resource Management Plan.

### **LOCATION**

The planning area includes approximately 166,550 acres of public land in Southern Washoe County, Nevada (Map 1).

### **PLAN AMENDMENT MODIFICATIONS**

A proposed amendment and a continuation of present management alternative were analyzed in the August 2000 environmental assessment. Based on that analysis, subsequent public input, consultation with Washoe County and other State and local agencies, the final plan amendment was developed. A summary of comments received and how those comments are addressed in this final plan amendment is located in Appendix A. Several wording modifications have been included in this final document to provide explanation or clarification of the decision. Based on the comments, the following adjustments were made to the proposed amendment:

- , Changed number of acres for retention in public ownership from 160,620 to 160,020.
- , Changed number of acres designated for use by State and local government for R&PP from 4,300

to 4,390. The lands designated for disposal at the Spanish Springs Airport lease location have been added to the Recreation and Public Purposes (R&PP) designation. The airport lease will continue until such time as the airport is not compatible with the surrounding development or interest in continued airport operation ceases. These lands will then be managed consistent with an R&PP designation.

- , Changed number of acres designated for potential disposal into private ownership from 1,630 to 2,140. This increase in acres for disposal reflects the addition of lands with existing private aggregate operations and the BLM Wild Horse facility in Palomino Valley.
- , Decreased number of acres available for geothermal leasing in the Steamboat Known Geothermal Resource Area from 2,224 to 1,933. This decrease of 291 acres for leasing is in the Toll Road area which has been designated for disposal and has no existing leases.
- , Removed all 2,956 acres available for geothermal leasing in the Warm Springs area due to the lack of a sufficient resource for development and no existing leases.
- , Removed the “Closed” to OHV use designation from the Granite Hills area and part of the area adjacent to the Hungry Valley OHV Area in response to numerous public comments and because of the existence of various roads and rights-of-ways.
- , Adjusted boundary overlap of the Hungry Valley OHV Area and the Carson Wandering Skipper habitat site ACEC. Also removed private land from the ACEC.

## **FINAL PLAN AMENDMENT DECISION**

The objective of the plan amendment is to improve management of public lands in the Southern Washoe County urban interface (Map 1) and to be consistent with the Washoe County Regional Open Space Plan and to provide for limited community expansion while maximizing open space values. The final decision consists of the following elements:

### **LANDS**

#### **Retention/Acquisition**

- ! Designate 160,020 acres for retention in public ownership under the administration of the BLM (Map 2).
- ! Lands retained in public ownership will be managed to protect open space, visual, recreation, watershed, and wildlife resources. Protection of these resources will be given priority over other land uses.
- ! Private lands in southern Washoe County that are designated as desired open space in the Reno, Sparks, and Washoe County Master Plans and the Washoe County Regional Open Space Plan would be considered for acquisition opportunities by the BLM. This includes the corridor of land on both sides of the Truckee River, east of Sparks. Acquisition opportunities may include acquisition of conservation easements or other interest in private lands.
- ! Future acquisitions will take into consideration the costs of management, restoration, and liability to the BLM.
- ! Future acquisitions within the planning area, acquired by exchange, donation, or purchase that fall under BLM jurisdiction, will be managed the same as adjacent BLM lands. The BLM will examine

the need to prepare activity level plans on all lands acquired.

**Acquisitions must meet one or more of the following criteria:**

- < Facilitate access to public lands and resources
- < Provide resource protection
- < Facilitate implementation of the RMP
- < Provide for a more manageable land ownership pattern
- < Maintain or enhance public recreational uses and open space values;

**In addition, BLM will focus acquisition efforts on lands:**

- < with few or no man-made improvements
- < not requiring substantial restoration efforts, except in certain circumstances when other entities can be involved as partners in the effort
- < with no known hazardous materials or contamination problems
- < with no noxious weed infestations that would present a long-term liability to the BLM

- ! Termination of Bureau of Reclamation withdrawals along the Truckee River, that are no longer needed for Newlands Project purposes, will be pursued. Unless specifically identified for disposal, lands no longer under reclamation withdrawal will be managed by the BLM for access, recreation, and riparian restoration opportunities.

**Disposal**

- ! Designate 4,390 acres for use by State and local government for recreational purposes through the Recreation and Public Purposes Act (R&PP) (Map 2).
- ! Designate 2,140 acres for potential disposal into private ownership. Exchange for other lands designated as desired open space in the Washoe County Regional Open Space Plan will be given priority over other disposal methods (Map 2).

**Protective Withdrawal**

- ! A protective withdrawal will be pursued on approximately 160,530 acres of public lands (all public lands within the planning area, excepting certain lands with high metallic mineral potential in the Pyramid and Olinghouse Mining Districts). The withdrawal would withhold the lands from settlement or entry under the general land laws, but not from exchange, sale, or Recreation and Public Purposes conveyances. Any non-Federal lands within the planning area, acquired in the future by exchange, donation, or purchase that fall under BLM jurisdiction, would be included in the protective withdrawal.

**Access**

- ! Provide for legal public access to public lands by retaining significant existing access and acquiring additional public access. Access acquisition opportunities to the Pah Rah Range, Petersen Mountain area, and the Jumbo area will be given priority.
- ! Retain legal public access to public lands across lands that are transferred from BLM to private or other ownership.

### **Utilities/Corridors**

- ! The Regional Utility Corridor Report, adopted for inclusion in the Truckee Meadows Regional Plan will be utilized as a guideline for future utility corridor and facility proposals on public lands for the southern portion of Washoe County. New overhead electrical transmission corridors and facilities (60 kilovolts or larger) proposed on public lands will be discouraged in favor of using existing corridors; routing on private land; or undergrounding in visually sensitive areas. The Reno, Sparks, and Washoe County Master Plans and the Regional Open Space Plan designating natural, visual, and cultural resources important to the community will be major considerations in analyzing utility proposals.

## **MINERALS**

### **Locatable Minerals**

The BLM has little discretion in permitting mining activities on mining claims - although strict mitigation can be imposed during regulatory and environmental review. In cases where mineral development conflicts with other land uses, a withdrawal to prevent mineral entry may be warranted. Withdrawals in excess of 5,000 acres require (by law) congressional review. The following are the decisions for locatable minerals:

- ! Withdraw 160,530 acres of public land and 15,800 acres of federally owned minerals from the operation of the locatable mining laws.
- ! Portions of the Olinghouse and Pyramid mining districts are excluded from the mineral withdrawal (Map 3). Lands withdrawn from mineral entry recognize the rights of mining claims existing at the date of the mineral segregation order, published in the Federal Register on July 8, 1998. Such lands are withdrawn, but subject to the valid existing rights of the claimants.
- ! Operators of existing mining claims within the plan boundaries would be required to file a “plan of operations” with the BLM prior to any mining activity proposed within the “Closed” travel designation areas, regardless of the size of the proposed disturbance.

### **Leasable Minerals**

The plan amendment decision is to close all areas to mineral leasing except the following (Map 3):

- ! Geothermal leasing on 1,933 acres in and adjacent to the Steamboat Known Geothermal Resource Area (KGRA).

### **Salable Minerals**

The majority of the plan amendment area will remain available for salable mineral disposal and existing and/or permitted aggregate operations will be maintained and developed. Provision for new aggregate operations on public lands will be secondary to protection of open space values. The following guidelines will be followed:

- ! Existing aggregate facilities on public land will continue to operate. Expansion of existing operations will require standard approval through a joint permitting process with the BLM (Mineral Materials Sale Contract) and Washoe County (Special Use Permit).
- ! New permanent aggregate facilities will be restricted to locations that are topographically screened or concealed from sight of existing or planned residential areas and major transportation corridors.

- ! New temporary aggregate facilities will be available to government entities only. Proposed sites will be restricted to locations that are topographically screened or concealed from sight or visually unobtrusive to existing or planned residential areas and major transportation corridors.

## **RECREATION.**

- ! Certain portions of the planning area (3,100 acres at Fred's Mountain and 1,940 acres NE of the Reno-Sparks Indian Colony) will be designated "Closed" to motorized OHV use in order to protect lands with high erosion potential, high resource and scenic values, and important cultural resources (Map 4). The total acres "Closed" to motorized OHV use in the planning area is 9,900, including the existing closure at the Petersen Mountain Natural Area.
- ! All other lands within the planning area currently designated "Open" to OHV use, with the exception of the Hungry Valley OHV Area and the Lemmon Valley Motocross Area, will be classified as "Limited". OHV use will be restricted to existing roads and trails.
- ! BLM and Washoe County are currently pursuing a memorandum of agreement (MOA) for cooperative law enforcement of OHV designations, dumping, and other violations on public lands.
- ! A buffer of one-quarter mile or more, as appropriate, will be maintained between populated areas and BLM permitted recreation events, if it is determined through environmental review that the proposed event may have negative impacts to nearby residents.

## **WILDLIFE**

- ! A master plan is being developed, with Washoe County, Nevada National Guard, Audubon Society, City of Reno, and Nevada Division of Wildlife, for the Swan Lake Nature Study Area in Lemmon Valley (Map 5). The 160 acres of public land, located in this area, will be withdrawn from locatable mineral entry, motorized vehicle use will be restricted to "designated" roads only. Any non-Federal lands within the Swan Lake Nature Study Area will be considered for acquisition by BLM and these lands will be managed consistent with this plan amendment.

## **AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACEC)**

The Federal Land Policy and Management Act of 1976 (FLPMA) describes an ACEC as follows: *The term "areas of critical environmental concern" means areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards.*

To be considered as a potential ACEC an area must meet the criteria of relevance and importance, as established and defined in 43 CFR 1610.7-2 as: *(1) Relevance. There shall be a present significant historic, cultural, or scenic value; a fish or wildlife resource or other natural system or process; or natural hazard. (2) Importance. The above described value, resource, system, process, or hazard shall have substantial significance and values. This generally requires qualities of more than local significance and special worth, consequence, meaning, distinctiveness, or cause for concern. A*



*natural hazard can be important if it is a significant threat to human life or property.*

Following are the three ACEC's (see appendices B thru D for the internal nominations and analyses) designated in this plan amendment and guidelines to be followed for each:

**Carson Wandering Skipper ACEC**

- ! Designate the 243 acre Carson Wandering Skipper habitat site for the wandering skipper butterfly as an ACEC (Map 5), to be effective upon approval of this plan amendment.
- ! Within two years of approval of this plan amendment, a site-specific, detailed ACEC activity plan and environmental assessment will be completed, in coordination with the University of Nevada Reno, U.S. Fish and Wildlife Service, and Nevada Division of Wildlife.
- ! Restrictions described in this plan amendment (OHV limitations and mineral withdrawal) will be adequate to protect the site until completion of the activity plan.
- ! Any non-Federal lands in the area, identified as habitat for the Carson wandering skipper, will be considered for acquisition and will be included in the ACEC designation.

**Pah Rah High Basin (Dry Lakes) Petroglyph District ACEC**

- ! Designate the 3,881 acre Pah Rah High Basin (Dry Lakes) Petroglyph District as an ACEC (Map 5), to be effective upon approval of this plan amendment.
- ! Within two years of approval of this plan amendment, a site-specific, detailed ACEC activity plan and environmental assessment will be completed, in coordination with the Nevada State Preservation Office, Washoe County, Washoe Tribal Council, Pyramid Lake Paiute Tribal Council, Reno-Sparks Indian Colony.
- ! Restrictions described in this plan amendment for OHV limitations and mineral withdrawal will support recommendations for special management of this ACEC and the above specified activity plan will include explicit protective and monitoring measures.
- ! Any non-Federal lands in the area, identified as important for petroglyph resources, will be considered for acquisition and will be included in the ACEC designation.

**Virginia Range Williams Combleaf Habitat Area ACEC**

- ! Designate the 473 acre Virginia Range Williams Combleaf Habitat Area as an ACEC (Map 5), to be effective upon approval of this plan amendment.
- ! The existing Conservation Agreement (March 24, 1997) between the BLM Nevada State Office and U.S. Fish and Wildlife Service for conservation actions for the habitat area will continue to be implemented (see appendix E). As described in the agreement, actions may be revised to include other land management agencies, address current conditions and additional populations.
- ! Restrictions described in this plan amendment for OHV limitations and mineral withdrawal will provide additional protection for this habitat area and an activity plan is not needed.
- ! Any non-Federal lands in the area, identified as habitat for the Virginia Range Williams Combleaf, will be considered for acquisition and will be included in the ACEC designation.

## **CONSULTATION AND COORDINATION**

### **SCOPING**

This RMP Amendment has been developed through a joint planning process with Washoe County. Public scoping was initiated with a notice published in the Federal Register in July 1998. Notices of public open houses and invitation for public comment were published in local newspapers and sent to known interested parties, government entities, and the Nevada State Clearinghouse. This was followed by two BLM/Washoe County joint public open houses held at the BLM Nevada State Office and the Washoe County Commissioners Chambers in Reno in September and October 1998. Representatives from BLM and Washoe County also presented the proposed plan amendment to the following eight Washoe County Citizen Advisory Boards: Spanish Springs, Galena/Steamboat, Sun Valley, North Valleys, Southeast Truckee Meadows, Cold Springs, East Washoe Valley, and Warm Springs. In addition, the proposal was presented to the following: Washoe County Planning Commission, Washoe County Parks Commission, City of Sparks Parks and Recreation Commission, City of Reno Parks and Recreation Commission, Sparks Citizen Advisory Committee, Reno Southeast Neighborhood Advisory Board, Washoe Storey Conservation District, and the Nevada Division of Minerals.

### **PROPOSED PLAN AMENDMENT**

A Notice of Availability and Public Meeting for the Proposed Southern Washoe County Urban Interface Plan Amendment and Environmental Assessment, Proposed Designation of Three Areas of Critical Environmental Concern, and Proposed Withdrawal of Public Land; Washoe County, Nevada was published in the Federal Register on July 24, 2000. This published notice initiated the 60-day comment period that ended on September 22, 2000. The notice was also published in local newspapers and the proposed plan amendment was sent to 532 interested parties, government entities, and the Nevada State Clearinghouse. A summary of comments from the 86 comment letters received and how those comments are addressed are found in Appendix A of this document.

A public open house was held at the BLM Nevada State Office in Reno on August 24, 2000 and was attended by 27 individuals. Representatives from BLM and Washoe County presented the proposed plan amendment to the following Washoe County Citizen Advisory Boards: Spanish Springs, Galena/Steamboat, Sun Valley, North Valleys, Southeast Truckee Meadows, Cold Springs, East Washoe Valley, and Warm Springs. Presentations were also made to the following: Sierra Front Northwestern Great Basin Resource Advisory Council, Washoe County Planning Commission, Washoe County Board of Commissioners, Sparks Citizen Advisory Board, Truckee Meadows Regional Planning Agency, joint meeting of the Reno, Sparks, and Washoe County Parks and Recreation Commissions, Reno Parks Commission, Red Rock Property Owners Association.

Consultation has been conducted and is ongoing with the Washoe Tribe, the Reno-Sparks Indian Colony, and the Pyramid Lake Paiute Tribe in conformance with the Native American Graves Protection and Repatriation Act and the American Indian Religious Freedom Act and the Environmental Justice Executive Order.

### **BLM Preparers/Reviewers**

| <i><b>NAME</b></i> | <i><b>RESPONSIBILITY</b></i>  | <i><b>EDUCATION</b></i>                       | <i><b>EXPERIENCE</b></i> |
|--------------------|-------------------------------|---|--------------------------|
| Terri Knutson      | Project Manager, Air          |   | 13 Years                 |
| Jo Ann Hufnagle    | Lands                         | B.S. Natural Resource Mgmt.                   | 21 Years                 |
| Terry Knight       | Recreation, Visual Resources  | M.A. Recreation<br>B.S. International Affairs | 22 Years                 |
| Walter DeVours     | Wildlife Resources, ACEC      | B.S. Wildlife Biology                         | 25 Years                 |
| William Brigham    | Wildlife Resources, ACEC      | B.S. Wildlife Biology                         | 32 Years                 |
| James deLaureal    | Soil Resources, Noxious Weeds | B.S. Agronomy                                 | 20 Years                 |
| Ron Tauchen        | Geology/Minerals              | B.A. Geology                                  | 22 Years                 |
| Peter Raffetto     | Range Resources               | B.S. Range Mgmt/Economics                     | 15 Years                 |
| Peggy Waski        | Cultural Resources, ACEC      | B.A. Anthropology                             | 15 Years                 |
| Ken Simpson        | Maps, GIS                     | M.E. Education                                | 20 years                 |
|                    |                               |   |                          |

### **Other Agency Preparers/Reviewers**

Bill Whitney - Washoe County Department of Community Development

Alan Coyner - State of Nevada, Division of Minerals

## DECISION RECORD/FINDING OF NO SIGNIFICANT IMPACT

### DECISION

The Final Southern Washoe County Urban Interface Plan Amendment is approved, as modified.

### RATIONALE

The proposed plan amendment and environmental assessment (EA-NV-030-00029) were developed and issued to the public jointly with Washoe County in July 2000. The environmental assessment analyzed two alternatives, the Proposed Action and the Continuation of Current Management Alternative. A total of 86 comment letters were received during the 60-day review period and several modifications were made to the plan amendment in response to those comments (see page 2 for plan amendment modifications). All modifications are within the scope of the two alternatives and have, therefore, been fully analyzed in the environmental assessment. The plan amendment will limit future mineral and land development within the urban interface, but will protect valuable open space resources. It will implement the decisions of the joint BLM/Washoe County planning process and is consistent with the Federal Land Policy and Management Act of 1976 and the Land Use Master Plans of Reno, Sparks, and Washoe County, and the Washoe County Regional Open Space Plan.

### FINDING OF NO SIGNIFICANT IMPACT

Implementation of the plan amendment will reduce the potential for future adverse impacts to visual, watershed, recreation, and wildlife resources on public lands in the southern Washoe County urban interface. While the plan amendment will limit future mineral and land development, protection of open space will result in minimizing negative impacts to the quality-of-life in southern Washoe County. Therefore, the amendment will have no significant impact and an environmental impact statement is not required.

### APPROVED:

  
Robert V. Abbey  
State Director, Nevada

1-9-01  
Date

## **APPENDIX A**

### **SUMMARY OF COMMENTS & RESPONSES**

**SUMMARY OF COMMENTS AND RESPONSES**  
**PROPOSED SOUTHERN WASHOE COUNTY URBAN INTERFACE**  
**PLAN AMENDMENT AND ENVIRONMENTAL ASSESSMENT**

**Total of 86 comment letters received.**

**LANDS**

1) Remove the public land where the Spanish Springs Airport is located from the disposal list. The land now under airport lease should revert to County R&PP when the airport is no longer viable here. *Map 2 has been changed to reflect removal of the Spanish Springs Airport from the disposal designation to R&PP. BLM will continue the airport lease until such time as it becomes incompatible with the surrounding community (as per recommendation of the Spanish Springs Citizen Advisory Board, 10/11/00).*

2) Support retaining lands around Huffaker Hills for R&PP.

3) Remove disposal designation from public lands in the East Truckee River Canyon, with exception of aggregate facilities north of Mustang, from disposal list.

*The farthest east parcel has been removed from the disposal designation. The next parcel to the west will remain for disposal and the public land adjacent to the west is also added for disposal. The rationale for the disposal designation for this area is that it is far from the river and is an area that is highly developable in an area that is already extremely built up and disturbed.*

4) Washoe County should acquire undeveloped public land and let the residents of Washoe County decide how it is to be used.

*The advantage of this very public process is that it was not necessary for Washoe County to expend public monies to buy public land, the land is there for the community. BLM and Washoe County attended many CAB meetings, County Commission meetings, County Planning Commission meetings, etc. to collect input from the public who consistently supported conservation of open space. In many ways, the outcome of this plan has been decided by the residents of Washoe County.*

5) Opposed to redesignation of lands in north part of Lemmon Valley from disposal to retention.

*The designation of these lands to retention and R&PP is in response to citizen input and the high values for visual resources and open space, as described in the Washoe County Regional Open Space Plan.*

6) Strong request that the 40-acre parcel of public land in Antelope Valley that is currently proposed designated disposal should be retained as open space or considered for a park by Washoe County. *Washoe County Parks was contacted and there are no plans for a park in Antelope Valley. The BLM, through this plan amendment is committed to improving management of public lands in Southern Washoe County. Smaller isolated parcels of public land, such as that parcel in Antelope Valley, are very difficult to manage and the problems of dumping and other unlawful activities are impossible to prevent and end up as a liability to the taxpayers. To comply with*

*the purpose of this plan, the parcel is designated for disposal.*

7) Legal access to the Pah Rah Mountains is very limited. Suggest a route from the Patrick exit on I-80 - would need to acquire approximately 3/4 mile of private land.

*Suggestion noted.*

8) The 468 acres adjoining the City of Reno and identified on Map 2 for disposal must be held in public ownership for park and recreational management - the North Valleys and Sun Valley are in dire need of a regional park.

*The disposal designation for this parcel of public land has been in effect for many years and at the time of this plan amendment a land exchange is well under way. The exchange includes 360 acres of this parcel to be deeded by the proponent to Washoe County to protect open space and sensitive plant and habitat values.*

9) Homeowners surrounding the proposed disposal lands on Toll Road ask BLM to remove the 35 acres of isolated parcels from disposal designation. Further development of these lands would impact existing wells, wildlife, wild horses, T&E Species, and quality of country setting for residents. Residents would like the lands to stay as is.

*As discussed in Comment #6, the BLM is committed to improving management of public lands through this plan. The smaller isolated parcels are difficult to manage and many problems develop that could be a liability to taxpayers. Again, to comply with the purpose of this plan, the parcels are designated for disposal.*

10) Oppose disposal of land Northwest of Sun Valley to Washoe County for R&PP without provision for OHV travel on pre-existing trails. Washoe County must maintain access into the hills in this area, a provision should be made in the R&PP that the County allow such access.

*This element has been added to the Final Plan Amendment Decision under Access.*

11) Two distinct land uses/designations should be clearly identified depending on whether the property is in the Disposal Area or Open Space Area. Pursuant to Washoe County zoning regulations, aggregate facilities are not permitted in the Open Space classification and therefore, by definition, aggregate facilities should be excluded from the Open Space area in the Plan Amendment. If property is in the Disposal Area, then the reference to Open Space preference should be eliminated consistent with the Plan Amendment.

*In response to comments, the final plan amendment has been modified to redesignate the areas of existing aggregate operations for disposal.*

12) Encourage the BLM to become a partner in land acquisitions along the Truckee River but fear the criteria listed on page 4 could seriously impede such acquisitions - noxious weeds and a need for reclamation and restoration are a problem stemming from current mismanagement

*Some clarification in the wording has been included in this final plan amendment but there is nothing in the criteria that would obstruct acquisitions, with partners, along the Truckee River.*

*The main concern is that there would not be a perpetual liability to the government.*

13) It may be valuable to include on Map 2 those lands that might be considered for acquisition - lands identified for disposal would preferably be exchanged for river corridor lands and access.

*The BLM and the public are very sensitive to designating specific private lands for acquisition.*

*The decision and the acquisition criteria listed on pages 3-4 of the final plan amendment detail*

*acquisition opportunities, including the river corridor.*

14) We are long time residents and feel the time has come to limit growth in the Reno area.

15) Please listen to the public in support of the Proposed Plan Amendment.

16) Strongly support BLM idea to preserve public access to BLM lands.

17) Agree with the plans proposed for the land surrounding Sun Valley but concerned about the proposed private ownership of the peak of Red Hill - please make assurances that same procedures will be followed regarding construction of additional towers.

*The ongoing land exchange (see answer to comment #8) that includes Red Hill would put that parcel into private ownership subject to valid existing rights for the communication sites.*

*Further development or additional sites would fall under the authority of Washoe County and the Special Use Permit process.*

18) USFWS recommends that as broad a corridor as possible along Truckee River should be acquired - should include entire floodplain and a buffer to maximize restoration. If acquired for recreation, facilities should be kept out of riparian area. Question disposal along Truckee River, BLM should retain all areas along the River.

*Comment noted, see wording clarification on pages 3-4. BLM is committed to acquisition of lands along the river in partnership with other entities. The proposed plan amendment identified parcels along I-80 in the Truckee River Canyon for disposal that appeared, on the small scale map, to be along the river. Although none are on the river, the furthest east parcel has been dropped from the disposal designation. The next piece to the west identified for disposal is in an area that is highly disturbed and developed and is just under one half mile from the river. This parcel, the small piece of public land adjacent, and the two pieces further west are designated for disposal.*

19) USFWS concerned with Jumbo Area on the list of priorities for BLM acquiring access due to potential for OHV use in the proposed Williams Combleaf ACEC. Recommend surveys be conducted prior to increasing public access.

*Public access to public lands is an issue heard repeatedly throughout this process. Legal public access to the Jumbo area is presently very restricted by private land. The final plan amendment includes the "Limited" to existing roads and trails OHV designation that includes this area. The Virginia Range Williams Combleaf Habitat Site Conservation Agreement includes measures to monitor, protect, and manage this resource.*

20) NV State Lands recommends some flexibility needs to be added to the text regarding R&PP's that would accommodate future, but not yet anticipated, non-federal needs in areas designated for retention. Also needs to be provision in text that clearly provides for future rights-of-way, easements, communication sites, etc. across or on lands designated for retention. Also, checkerboard lands exist within the plan area and should identify on map as suitable for ownership consolidation through exchange/acquisition. BLM should classify all small isolated parcels of public land for disposal or for future R&PP.

*Although an amendment to the resource management plan is the only vehicle for changing land use designations for public lands, BLM and Washoe County have endeavored to address the future needs of the community through extensive outreach to local agencies and citizens groups.*



*The plan amendment does not preclude the current BLM policy regarding future rights-of-way, easements, etc. except that the BLM will use the Regional Utility Corridor Report as a guideline for future utility corridor and facility proposals on public lands in this area. BLM and Washoe County have attempted to classify small isolated parcels in the planning area appropriately.*

### **MINERALS**

21) Leave the existing aggregate facilities out of the open space designation, they should be designated for disposal. The privately-owned Sha Neva Hungry Valley Sand Pit is adjacent to public land and a portion of the deposit extends onto public land. This area should be designated for disposal.

*See response to comment #11, the existing aggregate operations on public land are redesignated for disposal in the final plan amendment. However, the public lands adjacent to the privately-owned Hungry Valley Sand Pit have never been designated for disposal and were not designated as such in the proposed plan amendment, therefore cannot be designated for disposal in the final plan amendment.*

22) Existing aggregate mineral deposits and operations should be designated on Map 3 as being “Areas of High Mineral Potential”.

*As discussed in the proposed and final plan amendments, the majority of the planning area will remain open to salable mineral disposal with certain guidelines regarding topographic screening and protection of open space values. The purpose of Map 3 is to depict areas that will be excluded from mineral withdrawal and mineral leasing. Map 3 has been amended to clarify high potential for metallic minerals.*

23) The proposed guidelines for operation and expansion of existing aggregate operations on public lands (joint permitting process with BLM and Washoe County) appears to lay another level of discretionary authority over an activity with a great deal of discretionary action which could mean an unexpected future closure of this mineral commodity.

*Joint permitting of aggregate operations on public lands is existing policy for both BLM and Washoe County to streamline the process for operators.*

24) BLM’s proposed public land designations regarding aggregate sources are not consistent between aggregate operators.

*Throughout the scoping process BLM and Washoe County extensively solicited comments. Many comments were received and the proposed plan amendment reflected those comments and suggestions.*

25) The Proposed Plan Amendment should recognize “High Mineral Potential” non-metallic mineral deposits on public land, in particular the Oil-Dri clay deposit in Hungry Valley and the existing mineral material operations.

*Map 3 in the final plan amendment has been amended to clarify that it depicts high potential for metallic minerals on public lands. Due to the recent strong negative reaction from the public and the Reno-Sparks Indian Colony regarding proposed mining in Hungry Valley, it is very clear that mineral development is not a compatible land use within the planning area. Please see response to comment #28.*

26) Concerned about trend of withdrawing minerals across the West and cumulative impacts to industry.

27) Need to be specific as to the number of mining claims and location of claims for last 10 years - is there an increase or decline in numbers.

*The general trend for location of mining claims has been down approximately 50% over the last 10 years. As described on page 5 of this document, lands withdrawn from mineral entry do not affect valid mining claims existing at the date of the mineral segregation order.*

28) The withdrawal in the Proposed Plan Amendment adds no protection for existing vested rights to mine and may encourage interference with rights to ingress and egress. Request that Oil-Dri mining claims be designated for mining purposes and excluded from permanent withdrawal.

*Public lands withdrawn from mineral entry embrace mining claims existing at the date of the withdrawal. Such lands are subject to the valid existing rights of the claimants.*

29) Strongly support the mineral withdrawal and lease closure with the following exceptions: mineral lease closure should include the Steamboat Known Geothermal Resource Area, several portions of the EA need strengthened with respect to minerals - existing mining claims and valid existing rights, BLM should require complete validity exams to prove that a valuable mineral exists and a profit can be made by developing it.

*Some additional portions of the Steamboat KGRA will be closed to geothermal leasing (see map 3). The remaining parcels have existing leases and geothermal development around them. The new 3809 Surface Management Regulations (to go into effect Jan. 20, 2001) have addressed the issue of existing mining claims within a mineral withdrawal - a full validity exam will be required prior to approval of a plan of operations.*

30) USFWS concerned with not closing of geothermal leasing in Warm Springs area - Map 3 and Map 5 appear to show that there is a conflict between geothermal leasing and the Wandering Skipper ACEC. Also concerned with potential impacts of geothermal development in and adjacent to the Steamboat Known Geothermal Resources Area to Steamboat buckwheat.

*This final plan amendment closes geothermal leasing in the Warm Springs area (see map 3) due to the lack of a sufficient resource and there are currently no leases on those properties. The existing Steamboat Buckwheat ACEC is in place to protect that resource.*

## **RECREATION**

31) Opposed to closure of the area adjacent to the Hungry Valley OHV Area to OHV travel. The steep, rocky terrain does not allow new trails to develop and organized events have occurred here over the years. Closure from the trail along the ridgeline towards Spanish Springs would be acceptable. It is not fair to lock one part of the public out of using public land.

*In response to numerous comments the OHV closure was removed from the area adjacent to the Hungry Valley OHV area through the trail on the ridge line. The area will be closed from the trail and down the slope to the east into Spanish Springs. The OHV closure will also be removed from the Granite Hills areas (see Map 4). These areas removed from closure are designated "limited" to existing roads and trails, consistent with the rest of the planning area.*

32) Support limiting off-road, ATV, and four-wheel drive vehicle access to BLM land in and around Carson City and Reno, Nevada.

33) Opposed to any OHV Closures but support the "Limited" to existing roads and trails in all areas.

34) Should limit OHV use to designated roads and trails, the limited to existing roads and trails is not enough protection for resources.

*In the public process for this plan amendment, the limited to existing roads and trails was found to be a fair and acceptable limitation for this activity.*

35) BLM is not complying with existing policy (EO 11644) concerning monitoring effects of OHV use on public lands. Designating “sacrifice areas” (Hungry Valley) conflicts with existing policy that OHV use be located to minimize damage to soil, vegetation, and harassment to wildlife or disruption to wildlife habitat.

*The Hungry Valley OHV Area is not a new designation and has several monitoring and protective measures built into the original designation to minimize damage to resources.*

36) The EA does not mention the ongoing national effort to reform OHV policy. Any policy changes that arise from that effort would effect OHV management in the Proposed Action.

*This plan is consistent with anticipated new policy changes. New policies will be implemented, as appropriate.*

37) Urge the BLM to follow through with the Proposed Plan Amendment - ORV overuse has resulted in obvious impacts to natural resources. BLM has the responsibility to regulate ORV use to protect natural resources.

38) BLM should implement and enforce ORV regulations that remove ORV’s from all but designated ORV areas to enhance the enjoyment of public land for other users.

*The BLM is charged with managing public lands for multiple use and all users. This plan amendment attempts to maximize the enjoyment and reduce the conflicts on public lands for all, including OHV users.*

39) Encourage BLM to persist with OHV limitations as they are a good compromise between protecting natural resources and accommodating those who enjoy OHV use. Enforcement is important and we are pleased that BLM and Washoe County are joining forces with a MOU.

40) It is premature to close roads to OHV’s and limit to designated roads, wild horses do much more damage.

*This plan amendment does not close roads and limits OHV’s to existing roads not designated roads.*

41) BLM land in Warm Springs along Winnemucca Ranch Road should consider the use of a mile buffer between residential property owners and OHV users. The two very different uses should be isolated from each other. Fences, OHV loading ramps and sanitary facilities, garbage pick-up, signs, seeding buffer area, and requirement for dust control for events are suggested. Since Hungry Valley will be only Open designation, all OHV users who don’t use area now will be forced into area and more impacts to natural resources and residents will occur.

*This plan amendment attempts to reduce impacts from BLM permitted events through buffering between populated areas and the events. See decision for recreation regarding buffers on page 6.*

42) Keep Fred’s Mt., Granite Hills, and SE portion of Hungry Valley open to ride horses and trail (mountain) bikes.

*Fred’s Mountain will be closed to motorized vehicles but Granite Hills and Hungry Valley will*

*remain open. Equestrians and mountain bikes will still be able to use all three areas.*

43) As a resident of Jumbo Grade Area recognize that OHV users deserve access to public land but believe areas of access should be clearly defined and restricted to designated areas. Question ability to enforce the Limited to Existing Roads and Trails as proposed in the Plan. Also propose BLM sign (pack in-pack out) and put a dumpster in area where littering is a problem - willing to volunteer to maintain area around dumpster.

*BLM encourages citizen volunteers to assist in management of public lands, such participation is invaluable. Please see response to comment #38 regarding all users of public land.*

44) Closure of Granite Hills to OHV use would be almost impossible because of extensive regular use of existing roads and single track trails.

*The proposed OHV closure of Granite Hills has been eliminated and OHV use will be limited to existing roads and trails.*

45) Propose expansion of Lemmon Valley Motocross Area to include the section of land to the SE of the present area. The road and trail closest to the housing area is approximately 1/4 mile away from houses. Would also propose acquisition of the private land between the Motocross Area in Lemmon Valley and the BLM land to the East. The Motocross Area could be expanded and would reduce current confusion of where public land starts.

*The public land to the south and east of the motocross area has been designated for Recreation and Public Purposes (R&PP) for Washoe County as a buffer between the air races at Stead Airport and populated areas. Acquisition of private land by the BLM would need to fit the criteria for acquisition described on pages 3-4 of this document.*

46) Map 4 shows some overlap of the OHV open Area and the proposed Wandering Skipper ACEC. USFWS recommends adjusting boundary to avoid conflicts.

*The boundary overlap on the map has been adjusted (see map 4).*

## **WILDLIFE**

47) Support creation of the Swan Lake Nature Study Area so long as it remains limited to current boundaries and does not limit ability to develop, without conditions, the private lands directly south into an industrial park.

*The BLM and this plan amendment have no authority on private lands.*

48) Water needs for wildlife and livestock are not addressed. Opportunities for providing dependable water should be explored and encouraged.

*Specific projects for providing water to wildlife and livestock are beyond the scope of this plan amendment. Such projects may be proposed and developed at any time as needed.*

49) The Carson wandering skipper became a candidate for listing under ESA on Oct. 25, 1999.

USFWS recommend adding this subspecies to this section, if appropriate (Pg.11).

*Not including this subspecies on page 11 of the environmental assessment (Affected Environment) was an oversight but it was included on page 17 (Environmental Consequences) and the analysis of the nomination is included in Appendix B.*

50) USFWS recommends modifying second paragraph to read (TE&S, Pg. 17), "The creation of the Carson wandering skipper ACEC, potential acquisitions of crucial habitats, and the development of a

conservation plan would assist in providing measures to conserve this subspecies.”

*Recommendation noted. The suggested wording change in the EA would not change the intent or outcome of the document and this final plan amendment does not include the EA.*

### **AREAS OF CRITICAL ENVIRONMENTAL CONCERN**

51) Opposed to any motor vehicle access restrictions to the Pah Rah /Dry Lakes petroglyph area as a result of ACEC designation. Suggest management along the lines of Grimes Point Archaeological site. *Suggestion noted. A management plan for this ACEC will be developed within two years of approval of this final plan amendment (see page 7).*

52) Creating an ACEC for cultural resources may draw more attention to the area resulting in more vandalism. Some form of hands-on management is necessary.

*The need to protect the petroglyphs and how to do that was debated at length. However, several newspaper and magazine articles have been published on the area and some vandalism has occurred, it was necessary to enact some measures.*

53) Opposed to creation of any ACEC’s without additional information and study. Suggest an EA for each proposed ACEC to provide adequate solutions to the needs of the public and the resource. *An EA will be completed for each ACEC management plan, see pages 6-7 of this final plan amendment.*

54) USFWS supports designation of ACEC’s and recommends definition of an ACEC be stated in this section.

*Definitions of ACEC from FLPMA and the CFR have been included, see page 6.*

55) NV Natural Commission recommends addition of 40 acre BLM land adjacent to existing Steamboat Geothermal ACEC to enhance management and further protect critical habitat for Steamboat Buckwheat.

*The 40-acre parcel adjacent to the existing ACEC contains geothermal leases and the surrounding area is highly developed, therefore, it was determined that adding this parcel in the ACEC would be impracticable.*

### **OTHER COMMENTS**

56) Need to address restoration or rehabilitation of burned areas. A different approach from the current conventional thinking to the overall fire management, suppression, and rehabilitation needs to be taken.

*Restoration of burned areas is beyond the scope of this plan amendment. Specific projects may be undertaken at any time, as necessary. See response to comment #48.*

57) The EA needs to more specifically analyze actions proposed. The EA also needs to fully address the Washoe County land use restrictions that currently exist. Discussion under Affected Environment is incomplete - in Golden Valley there is an OHV closure that was published in the Federal Register in 1995 and is not discussed in the Plan Amendment/EA. Need to reissue the EA after a substantial rewrite to be legally defensible.

*It would be impractical to list all the Washoe County land use restrictions in this document, information may be obtained from the county. The emergency OHV closure in Golden Valley is*

*one of many such temporary administrative actions that may come and go as needed and do not need to be analyzed in a planning document.*

58) USFWS recommends adding purple loostrife to the list of introduced noxious weeds which exist in the area. Recommend modifying fourth sentence (TE&S) to read, “The Williams combleaf is a USFWS species of concern” (Pg. 9).

*Recommendation noted. See response to comment #50.*

59) USFWS recommends that Noxious Weeds section (Pg.16) include efforts of the NV Division of Agriculture, UNR and its Cooperative Extension office, and the USDA Agricultural Research Service which have provided assistance in control of several species. The Washoe-Storey Conservation District has also been involved in control efforts.

*Recommendation noted. See response to comment #50.*

60) USFWS, USFS, NV Wild Horse Commission support the Proposed Plan Amendment.

61) NV State Engineers office recommends determining presence or absence of water rights on properties prior to acquisition, exchange, or sale.

*Determination and disclosure of water rights is BLM policy for all such lands actions.*

## **APPENDIX B**

### **CARSON WANDERING SKIPPER ACEC INTERNAL NOMINATION AND ANALYSIS**

# **Carson Wandering Skipper**

## **Area of Critical Environmental Concern**

### **Internal Nomination and Analysis**

#### **I. Background**

The Carson wandering skipper (*Pseudocopaeodes eunus obscurus*) is a member of a monotypic genus of skipper butterflies that are locally and patchily distributed in grassland habitats on alkaline substrates in Nevada and California (Scott 1986). The genus is currently understood to consist of four subspecies (Austin and Emmel, 1998): *P. eunus eunus* in the western desert areas of southern California; *P. eunus alineae* in the eastern desert areas of southern California and two locations in southern Nevada;; *P. eunus flavus* widely spread through western and central Nevada and on the east slope of the Sierra Nevada in California; and *P. eunus obscurus*, known from two sites in west central Nevada and perhaps three sites in northeastern California (Brussard, *et al*, 1999).

This butterfly species seems to depend on a rather specialized lowland riparian habitat; moist to wet interior saltgrass meadows with some micro-relief, with a flower nectar source nearby. Much of this habitat type throughout the species range has disappeared as a result of agricultural or urban/industrial development during the last several decades. A search of 30 historic collecting sites in 1998 (Brussard, *et al*, *op cit*) found the species present at just eight of them. Six new localities were found, but 48 new sites considered to be good habitat were searched to find these populations.

The type locality for the Carson wandering skipper subspecies is the Carson Hot Springs drainage, Carson City, Nevada. It was discovered there by Peter Herlan of the Nevada State Museum in 1965, apparently just north of Highway 50. However, most of this habitat was subsequently destroyed by the construction of a shopping center. An extension of this population was located north of the original site several years later. Several specimens were collected in saltgrass habitats north of US 50 and south of Airport Road in the 1980's and early 1990's.

The last verified sighting of the Carson wandering skipper prior to a 1999 inventory (Broussard, *et al*, *op cit*) was in 1991. Sometime during the 1990's the northern portion of the habitat was developed into a series of office complexes, and a large part of the southern part of the habitat was destroyed by the Steinheimer Mitigation Site (intended to mitigate impacts to wetlands located off-site).

Because of the loss of habitat at the type locality and the potential impacts associated with the construction of the US 395 bypass around Carson City on the remainder of the habitat, Austin (1990)



considered the subspecies seriously imperiled and communicated this concern to the U. S. Fish and Wildlife Service. Although the Carson wandering skipper has no official status under the Endangered Species Act (ESA), the USFWS considers it to be a species of concern. An emergency listing package to give the Carson wandering skipper ESA status would seem likely if the Carson City site were lost without appropriate mitigation.

## **II. Current Situation**

It was because of the potential impacts arising from the US 395 bypass that Nevada Department of Transportation (NDOT) contracted for an inventory of known and potential sites for the Carson wandering skipper. This work resulted in **Report on the Distribution, Genetics, and Conservation Status of the Carson Wandering Skipper** by Peter Brussard and Becky Niell (Biological Resources Research Center, UNR) and George Austin (Nevada State Museum and Historical Society, Las Vegas). This report constitutes the current state of knowledge about the Carson wandering skipper, and serves as the basis for this nomination and evaluation.

In 1997, only two areas of the type locality in Carson City remained that were considered suitable habitat for the Carson wandering skipper; approximately 20 acres west of Lompa Lane, and another approximate 20 acre site near the Pinyon Plaza casino. These two site were inventoried in 1997 and 1998, and it was concluded that the Pinyon Plaza site does not currently contain Carson wandering skippers, and that the Lompa Lane population is apparently now extirpated or very close to extirpation.

In addition to finding a new and apparently undescribed subspecies of wandering skipper near Mono Lake, California, the contracted inventory located two new populations of the Carson subspecies. The largest of these is located on the Winnemucca Ranch Road, north of Reno and about seven miles northwest of the junction of this road and NV 445 (Pyramid Lake Highway); the other (with two disjunct populations) was near Honey Lake, California. It is the population discovered along Winnemucca Ranch Road that is the focus of this ACEC nomination and analysis.

## **III. Site and Population Description**

The principal Carson wandering skipper concentration area at the Winnemucca Ranch Road site is located in sections 22 and 23 of T. 23 N., R. 20 E., about equally divided between private and BLM ownership. Butterflies were observed at a site approximately one mile northeast of the concentration area, and saltgrass (the larval host plant) is abundant in the general area; suggesting they may occur at least in small numbers elsewhere in the valley. Approximately half (ca. 15 acres) of the main colony occurs on BLM administered public lands in a fenced pasture or holding area; the remainder of the colony is on private property.

Brussard established some inventory and monitoring transects on the BLM portion of the site in 1998, but felt that the standard inventory methodology used may not be appropriate for this subspecies.

Nothing is known of its dispersal distances to nectar sources, and the transects were placed in areas with nectar sources (which accumulate butterflies) rather than at random. Perhaps all that can be said, is that the Carson wandering skipper is “common” (usually observed but not in large numbers) at this site.

The newly located sites near Honey Lake in California were also sampled for some estimate of population density, using the same methodology as at the Winnemucca Ranch Road site. The data would suggest that the Honey Lake sites have approximately six to eight times the density of Carson wandering skippers as the Winnemucca Ranch Road site. However, the sites are not really comparable, as the former site has nectar plants concentrated in four bunches while the latter site has nectar plants scattered over several acres. At both sites, Brussard considered the subjective estimate of “common” as the most reasonable estimate of population size.

#### **IV. Threats to the Population**

As discussed above, the population of Carson wandering skippers within Carson City is either extirpated or very close to that. At the two other known extant sites (Honey Lake, California and Winnemucca Ranch Road, Nevada) the population is considered “common”, transect data indicating between 31 and 57 individuals per hectare (12 - 22 individuals per acre). The total extent of the primary habitat at each of these sites appears to be in the 30 to 40 acre range, with some as yet undetermined secondary habitat range around the primary area.

Brussard (1998) presents a discussion that not just the Carson subspecies, but the entire species may be in decline. This is based on the small numbers of any subspecies that were found during the 1997 and 1998 field seasons, as well as their apparent disappearance from 73% of all sites where they had previously been collected. 1997 and 1998 were wet years and many saltgrass areas were flooded; perhaps when drier conditions return the species will rebound throughout its range. Many butterfly populations characteristically fluctuate over two or more orders of magnitude from year to year, and the wandering skippers may rely on the rare good year to build population levels sufficiently high to persist during the fair and poor years. The disappearance of the species from nearly three quarters of its previously known sites is, however, a reason for some obvious and serious concern.

For the Winnemucca Ranch Road site specifically, the continued urban sprawl northward by the City of Reno constitutes the greatest single threat to the continued viability of the site. Three parcels of private land (approximately 200 acres total) immediately north and east of the site are currently on the market. If these are sold for development, there is no reason to expect that the private lands now containing half of the primary habitat may not also become suburban “ranchettes”. Even without this, the infrastructure (principally roads, drainage and wells) necessary to support new development in the immediate area will likely pose serious threats to the continued viability of the site.

#### **V. ACEC Criteria and Evaluation**

To be considered as a potential ACEC and analyzed in land use plan alternatives, an area must meet the criteria of “relevance” and “importance” as established and defined in 43 CFR 1610.7-2. Additionally, to be designated an ACEC through the planning process, an area that is “relevant” and “important” must also require special management attention. A management prescription is considered to be “special” if it is unique to the area involved and includes terms and conditions specifically designed to protect the important and relevant value(s) occurring on that area.

### **A. Relevance**

There are four “relevance” criteria (1. Significant historic, cultural or scenic values; 2. Fish and wildlife resource; 3. Natural process or system; and 4. Natural hazards), and an area is “relevant” if it meets any one of them. In the case of the Winnemucca Ranch Road site for the Carson wandering skipper, both the second and third criteria are met. This site is essential for the maintenance and possibly for the survival of this sensitive species. This essential habitat (Critical Habitat if ESA listed) is indivisibly associated with the natural process that have created and maintain the site.

### **B. Importance**

The value, resource, system, process or hazard determined to be “relevant” must have substantial significance and value in order to satisfy the “importance” criteria. Here there are five “importance” criteria, one or more of which must be met and the Winnemucca Ranch Road site meets three of the five. It is definitely of more than “local significance” (criterion 1) as one of the three known locations in the world for the subspecies. It also has “qualities that make it fragile, sensitive, rare and irreplaceable” and “vulnerable to adverse change” (criterion 2) which relate to the presence of the Carson wandering skipper. Criterion 3 (“mandates of FLPMA”) is also met, in that the Bureau is charged with taking such actions as to prevent the ESA listing of species where possible.

Thus the Winnemucca Ranch Road site for the Carson wandering skipper is both “relevant” and “important” and a nomination as an ACEC should be carried into the Southern Washoe County Urban Interface Plan Amendment for analysis. As the possibility exists for the acquisition of additional essential habitat, the attached map outlines a larger area than just that currently under BLM jurisdiction and the analysis should be conducted on the present and potential size of the ACEC.

### **C. Special Management**

Although it is the land use plan analysis that determines special management needs, if any, the following quote from the Brussard, Niell and Austin report is included to establish the likely context for such special management.

“Major concerns include livestock management, OHV activity, encroaching development, changes in water table, and pesticide drift. The current use of the pasture as a holding pen for cattle during the fall is probably compatible with the conservation of *P. eunus* as long as the stocking density is not increased and livestock continue to be excluded in the spring and summer. Heavy livestock densities may cause excessive larval mortality through trampling, and cattle often nip flower heads off of nectar sources. However, some grazing will be required since the nectar plant at the area is an increaser (a species which increases under grazing pressure). An agreement on appropriate livestock management (stocking rates and season of use) in the pasture probably could be reached with the BLM.”

“The fence seems to have prevented OHV activity within the pasture, but it is always a threat in the unfenced portion of the habitat, particularly as the human population increases in the area. Moving the fence to include more of the habitat and to exclude the parts of the pasture not used by the butterflies and making sure that the fence is maintained should go a long way to minimize both livestock and OHV problems.”

“Encroaching development will be more difficult to deal with. While effective fencing will help keep unauthorized people off the key habitat area, drawdown of water through an increased number of domestic wells may result in changes in the water table, and the ditches and dikes that inevitably accompany development can eliminate sheet flow. All of these could result in habitat changes that would be detrimental to the skipper’s persistence. Furthermore, the *P. eunus obscurus* population in this area may extend well beyond the sample site, perhaps scattered throughout the valley wherever saltgrass grows, while the accumulation of adult individuals at the Winnemucca Ranch Road site may be due to the high density of nectar sources at the site. The loss of the extended saltgrass habitat to future development could result in the loss of some portion of this *P. eunus obscurus* population.”

“Pesticide drift from the alfalfa operation just to the west of the habitat area could inadvertently eliminate a large part of this *P. eunus obscurus* population. The frequency and intensity of pesticide use, if any, needs to be investigated, and strategy needs to be developed to deal with it.”

“Provided that the private land can be purchased, water rights established, and a management agreement reached with BLM, none of the other concerns seem to be insurmountable, at least in the short term, and the Winnemucca Ranch Road site could become an effective “reserve” for *P. eunus obscurus*.”

## **VI. Conclusion**

As the Winnemucca Ranch Road site for the Carson wandering skipper exceeds the minimum ACEC threshold criteria for both “relevance” and “importance”, and as at least an initial case can be made for special management needs for the area, I recommend that this area be designated as a Potential Area of Critical Environmental Concern, and that this designation and potential management needs be analyzed in the Southern Washoe County Urban Interface Plan Amendment.

Submitted By: Walter Devaurs 9/15/99  
Walter Devaurs, Wildlife Biologist Date

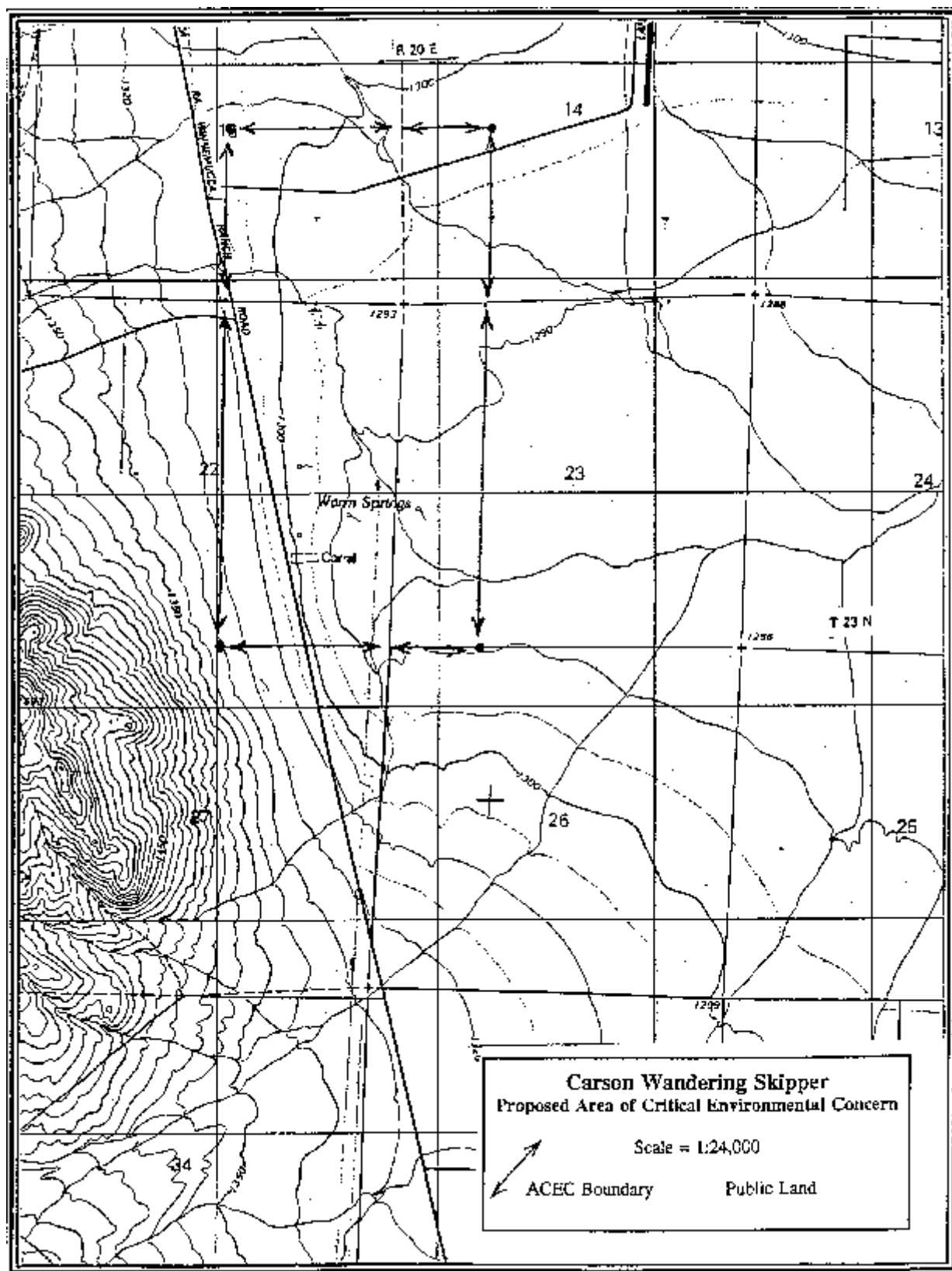
Reviewed By: Daniel L. Jacquet 9/17/99  
Daniel Jacquet, AFM Renewable Res. Date

Margaret L. Jensen 9/20/99  
Margaret L. Jensen, AFM Nonrenewable Res. Date

Approved By: John O. Singlaub 9.20.99  
John O. Singlaub, Manager Date  
Carson City Field Office

## References

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## **APPENDIX C**

### **PAH RAH HIGH BASIN (DRY LAKES) PETROGLYPH DISTRICT ACEC INTERNAL NOMINATION AND ANALYSIS**



**Pah Rah Range High Basins (Dry Lakes) Petroglyph District  
Area of Critical Environmental Concern (ACEC)**

**Internal Nomination and Analysis**

## **I. Background**

The High Basins (Dry Lakes) Petroglyph<sup>1</sup> District consists of hundreds of petroglyphs, rock rings<sup>2</sup>, grinding slicks, talus pits<sup>3</sup>, and lithic scatters located primarily along or within several north/south trending basalt ridges within the Pah Rah Range. Traditional boundaries of the Washoe and the Pyramid Lake Paiute tribes overlap in this region. The scenery is spectacular and the area is relatively untouched, with the exception of a large amount of introduced weeds. Antelope are frequently seen in the area, despite the proximity of nearby urban development. Spanish Spring Valley is directly west of the district. Although the High Basins District was apparently known by local residents for years, it was not until the

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<sup>1</sup>Petroglyphs are designs which have been pecked, abraded, incised or scratched onto a rock surface. Archaeologists have categorized design elements under different artistic styles. Of importance to this area are the Great Basin Abstract and Representational styles. The Abstract style is further divided into two main categories - Great Basin Curvilinear and Great Basin Rectilinear. Designs within the Curvilinear category include circles or variations thereof, wavy lines, and meandering lines. Rectilinear design elements include “rakes,” zig zag lines, bird tracks, grids and dots. Representational elements include zoomorphs, anthropomorphs, bows, and projectile points. Different design elements (styles) may be found on the same rock face.

<sup>2</sup>Rock rings are circular rock alignments, many of which are thought to be habitation features. Height can vary, depending upon the number of courses of rock. Rock rings have also been identified as caches, seed processing sites and hunting blinds. Diameter of the rings varies, dependent upon function.

<sup>3</sup>Talus pits are depressions in talus caused by human removal of rock. The pits are large enough to shelter at least one human being. In many cases, rocks have been stacked around the depression to form a wall. Suggested functions include hunting blinds and wind breaks.

late 1960s that archaeologists began to take a serious interest in the area. Excavations of eleven rock ring features and other archaeological sites were conducted at that time. Final results of this work were never published, although a few preliminary reports were developed. Several project driven inventories were conducted in the High Basins during the 1980s. The district was recommended “Eligible” for the National Register of Historic Places by Desert Research Institute (DRI) in a cultural resource report for a sludge disposal project proposed by the City of Reno. The recommendation was based upon the DRI cultural resource inventory as well as the previous work that had been conducted in the area (Johnson 1981). A National Register nomination of the district was prepared by a University of Nevada, Reno student in 1982, but never carried through to completion (Geier 1982). The existing National Register nomination and the boundary of the district must be substantially updated to reflect current knowledge and requirements prior to completion of the nomination process.

Also in the 1980s, a substantial portion of the petroglyph district was on private land. The Bureau of Land Management (BLM), Carson City Field Office, identified the private lands for acquisition for the purpose of federal protection and preservation of this significant resource. In the early 1990s, Tuscarora Gas Transmission Company was granted a right-of-way to construct a gas pipeline through public lands in the district. As mitigation for impacts associated with pipeline construction, Tuscarora Gas Transmission Company donated 3408 acres (about 5½ sections) of private lands to the United States which contained major petroglyph and rock ring features. The donation resulted in consolidation of public land ownership, thus improving BLM management capability.

Archaeologist Alvin McLane has been documenting petroglyphs within the High Basins since 1985. Originally, he attempted to document all sites he observed while hiking in the area, but “. . .before long found the futility in this endeavor because of the immense number encountered” (McLane 1999: 2). Since then he has confined his recordation to petroglyphs and merely plots the locations of lithic scatters, rock rings, talus pits, and rock cairns on his maps. He has recorded roughly 115 petroglyph sites and kindly provided the information to the BLM. Tentative boundaries for the ACEC have been developed based upon his data.

## **II. Current Situation**

The sites have never been completely researched, fully recorded, nor has the entire area been intensively surveyed. BLM personnel provided tours of the district for the Washoe and Pyramid Lake Paiute tribes, and both tribes consider the area highly important. Past surveys generally concentrated on petroglyphs along the basalt ridges; not much is known about the small basins. At present, 115 petroglyph sites have been documented by Alvin McLane. Many of these contain a multitude of petroglyph panels, although other cultural features have been documented as well: Site #18 contains 30 rock rings, Site #6 (26WA1612/CRNV-03-1058) contains 12 rock rings, and the Guzzler site (recorded as an outlier to the district) contains 40 talus pits (McLane 1999). These few examples demonstrate the wealth of the district. Survey work is continuing and more sites are expected to be found. Only a minor amount of excavation and analysis has been conducted within the district.

The nature of the surrounding terrain has greatly changed since its “discovery” in the late 1960s. At one time a rural environment, it is now bordered on the west by dense residential housing and golf courses; and urban development is also encroaching from the south. Use of this area will undoubtedly increase as residential neighborhoods develop in closer proximity to the district. Another factor contributing to the probability of increased use is good access. A major road which is passable with two-wheel drive in good weather crosses through the district. BLM personnel have seen motor homes on the road during the summer. A site description with photographs appeared in the local newspaper several years ago, bringing further attention to the area.

The Pistone Site, the only comparable *known* site to the High Basins District, is located in a remote location within the Wassuk Range. This site is also a large complex of petroglyphs, lithic scatters, and rock rings or alignments. Curiously, it appears to be lacking evidence of use during the Middle Archaic (1500 B.C. to roughly A.D. 700), as survey and minor excavations conducted in the 1980s indicated a Late Archaic time range (Johnson 1987). Access is obtained by foot or four wheel drive.

### **III. Site Description**

The Pah Rah High Basins Petroglyph District contains a plethora of petroglyph elements, rock rings, lithic scatters, talus pits, and grinding slicks concentrated within a proportionately small area. Petroglyph districts of this magnitude are rare.

The landscape, or setting, is an important quality that contributes to the district’s eligibility for the National Register of Historic Places. Despite urban expansion, the area still appears to be miles away from any population center. The area is quiet, and scenic - with little visual intrusions from modern society.

The ACEC boundary (approximately 3,900 acres) encompasses all, or portions of Sections 9, 10, 14, 15, 16, 17, 20, 21, 22, 28 and 29, T20N, R21E. This boundary includes the majority of the sites as currently known, although petroglyphs, rock rings, lithic scatters, and talus pits have been recorded as “outliers” of the current boundaries. The District is eligible for the National Register of Historic Places under

*Criterion C: that embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; and*

*Criterion D: that have yielded, or may be likely to yield, information important in prehistory.*

Pending further research, the district may also be eligible under

*Criterion A: that are associated with events that have made a significant contribution to the broad patterns of our history.*

Preservation of features is remarkable and accessibility to the area creates an opportunity for research and public interpretation. Cultural material includes milling stones, bone, flakes, and tools. In certain cases, milling stones have been incorporated into the rock walls. Rock rings appear to be habitation features, although some rings have been identified through analysis as seed processing structures. The petroglyph elements are both Abstract and Representational. The “Shooting Archer” site has two petroglyph panels containing humans with bows and big horn sheep. The depiction of the bow post-dates A.D. 700, the approximate date of bow and arrow introduction in the western Great Basin.

The last detailed study of four sites within the district was conducted by Far Western Anthropological Research Group, Inc. in 1995, as a part of project mitigation for the Tuscarora Pipeline Project. Data appeared to indicate Native American utilization of the area for hunting purposes since the Middle Archaic (3500 years ago), with an intensification of plant resource procurement and processing appearing with the rock ring features around A.D. 600 (Delacorte 1997).

#### **IV. Threats to the District**

Major threats to the district are the expansion of the urban environment, increased recreational use of the area (e.g. OHV), theft, vandalism, and development on both private and public lands resulting in fragmentation, and/or destruction of the district. Any alteration of the district’s setting could seriously damage the district as a whole.

The area has been subject to artifact collection for years. In the late 1960s when archaeologists began to study the area, they were told by local residents that one of the small basins was known as “Platter Valley” and milling stones (manos and metates) were taken away by the truck load. A residence in Spanish Springs Valley was observed to have milling stones lining a flower bed (Rusco 1981). The first time Site #92 (the Raven’s Cry Site), was recorded, a looter’s sifting screen was observed near a rock ring (McLane 1999). With increased use and the expansion of the urban population to the district’s “doorstep,” the possibility of losing the information contained within the archaeological sites is extremely high.

Trash dumping, shooting, and other destructive activities were observed south of the district. These activities dramatically increased as the distance to the nearby residences decreased. Urban development is continuing to move north, increasing the chances of damage to the district. Graffiti, paint ball games, and shooting are potential threats to the petroglyphs and other rock features. The chance that the area will become the repository for trash is very high.

At this time, Sections 17 and 9 are private. They may be acquired by the BLM during the Wade Fernley land exchange. If the lands remain private, they may be developed. Both of these sections contain petroglyphs and rock rings. A very significant site in Section 17, 26WA1604/CRNV 03-1053, contains 72 petroglyph panels and three rock rings. Development on these two sections could damage or destroy sites on those lands, as well as greatly damage the visual integrity of the district as a whole. The infrastructure needs of developed private lands such as access roads and powerlines also must be considered as a threat to the district's integrity. In addition, fragmentation of the district would make management of the area more difficult.

BLM has received inquiry or applications for developments on public lands in this area to accommodate the burgeoning population. These kinds of activities, as well as surface disturbance from mineral activities, also pose a threat to the resource (Although the lands donated to the United States by Tuscarora are not opened to entry, nor will they be opened in the future, the remainder of the district is currently open.).

## **V. ACEC Criteria and Evaluation**

There are two criteria that must be met for a resource to be designated an ACEC (See 43CFR1610.7-2 and BLM Manual 1613.11.). These are Relevance and Importance:

### **A. Relevance**

This criterion is met under 43CFR1610.7-2(a)(1) [See also BLM Manual 1613.11.A.1]: *A significant historic, cultural, or scenic value (including but not limited to rare or sensitive archaeological resources and religious or cultural resources important to Native Americans.).* The district is a highly significant cultural resource, and it is important to both the Washoe and the Pyramid Lake Paiute tribes.

### **B. Importance**

This criterion is met under 43CFR1610.7-2(a) [See BLM Manual 1613.11.B.1]: *Has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern, especially compared to any similar resource; and 2. Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change; and 3. Has been recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandates of FLPMA.* The district is more than locally significant as it contains information which can answer research questions on the prehistory of the Great Basin. Comparative analyses of data from different regions may also further our knowledge of American prehistory. In addition, the sheer magnitude of the visual aspects of the district; i.e., petroglyphs, rock rings, grinding slicks, etc.,

are of importance and interest on a nationwide basis. The district is definitely fragile, rare, irreplaceable, threatened and vulnerable to adverse change. FLPMA is the primary basis for managing cultural resources on public lands. It directs the Bureau to “protect the quality of . . . historical . . . resources and archaeological values” [Public Law 94-579, Title I, Section 102(8)].

The Pah Rah Range High Basins Petroglyph District is both “relevant” and “important,” and a nomination as an ACEC should be carried into the Southern Washoe County Urban Interface Plan Amendment for analysis. Since the possibility exists of acquisition of the private lands within the district, analysis should be conducted on these lands as well.

There is one more requirement necessary for ACEC designation. The area must require special management attention to protect the relevant and important values:

### **C. Special Management**

The land use plan analysis determines special management needs. The following are recommendations for consideration during the analysis:

1. Monitoring of the area for resource protection
2. Withdrawal of the area from mineral entry
3. Intensive inventory and documentation of the area to obtain baseline data necessary for management purposes
4. Completion of data analysis and reports for the 1960s/1970s excavations
5. Challenge Cost Share Agreement with a university for data recovery
6. Development of a management plan for long term preservation and public interpretation
7. Closure or Limited OHV designation
8. Acquisition of Sections 17 and 9.

## **VI. Conclusion**

The Pah Rah Range High Basins Petroglyph District meets the Relevance and Importance criteria for ACEC designation. Based upon this and the recommendations for special management needs to be considered during plan analysis, I recommend that this area be considered as a Potential Area of Critical Environmental Concern, and that this designation and potential management needs be analyzed in the Southern Washoe County Urban Interface Plan Amendment.

Submitted By:

Margaret Waski  
Margaret Waski, Archaeologist

7/19/00  
Date

and

Rebecca Lasell  
Rebecca Lasell, Archaeologist

7.19.00  
Date

Reviewed By:

Richard Conrad  
Richard Conrad, Assistant Field Manager  
Non-renewable Resources

7/21/00  
Date

Daniel Z. Jacquet  
Daniel Jacquet, Assistant Field Manager,  
Renewable Resources

7/27/00  
Date

Approved By:

John O. Singlaub  
John O. Singlaub, Manager  
Carson City Field Office

7.25.00  
Date

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<sup>4</sup>All references are on file at BLM, Carson City Field Office, Nevada.



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## **APPENDIX D**

### **VIRGINIA RANGE WILLIAMS COMBLEAF HABITAT AREA ACEC INTERNAL NOMINATION AND ANALYSIS**

## **WILLIAMS COMBLEAF AREA OF CRITICAL ENVIRONMENTAL CONCERN**

### **Internal Nomination and Analysis**

#### **I. Background**

Williams combleaf (*Polystenium williamsiae*) is a member of a small genus in the mustard family (Brassicaceae). It and Fremont's combleaf (*P. fremontii*-which has 3 varieties-*P.f. fremontii*, *P.f. confertum*, and *P.f. bisulcatum*) occur along the sandy clay margins of ephemeral lakes within the pinyon-juniper/sagebrush zone.

Williams combleaf was first collected in the foothills of the Virginia Range east of Little Washoe Lake, Washoe County, Nevada in 1982, and described as a new species in 1983 (Rollins 1983, Rollins 1993, Tiehm 1996). The species has been documented from very few sites in western Nevada and eastern California. This ACEC nomination is specific to the Virginia Range populations. This species occurs along the sandy clay margins and bottoms of small ephemeral lakes in sagebrush scrub vegetation. The plant occurs mostly within the Sagouspe Variant soil series, which extends from the outer edge of the lake beds to the extreme high water line (TNC 1993). Yearly fluctuations in precipitation result in a highly variable water regime in these habitats, causing minor shifts in plant distribution. In general, Williams combleaf resides within a zone between the barren pool bottoms and upland vegetation, where it occurs in association with big sagebrush (*Artemisia tridentata*).

The populations of Williams combleaf in the Virginia Range consist of three or four small sub-populations associated with the ephemeral lakes. These lakes are generally covered with shallow water during periods of runoff, which may persist for extended periods following wet winters. These lakes are located within .25 to .50 miles of each other, at elevations ranging between 5,670 and 5,760 feet (Knight 1990, TNC 1993, NVNHP 1995).

Plant numbers along the shorelines of these ephemeral lakes fluctuate from year to year. For example, numbers were estimated to be less than 50 individuals in 1987; 3,000-5,000 in 1990; more than 4,000 in 1992; 1,180 in 1994; and 41 in 1996 (Knight 1990, TNC 1993, NVNHP 1995, Bair 1996). It is likely that these population fluctuations are attributable to the variable precipitation in the region, which causes these lakes to fill completely in some years, and only partially in others.

The Virginia Range populations occur within the Bureau of Land Management's Carson City District. Resource management decisions, actions and guidance applicable to the Williams combleaf were most recently summarized in the 1987 Management Decisions Summary for the Lahontan Resource Area (BLM 1987). However, that document does not directly address resource management of the Williams combleaf. Three of the ephemeral lakes are on public lands managed by the BLM; a fourth is located

on adjacent private lands.

## **II. CONSERVATION STATUS**

Heritage Program Rank: The conservation status of native United States species is periodically ranked by the network of affiliated State-agency based Natural Heritage Programs, using standardized methods developed by The Nature Conservancy (TNC). Status at state, national, and global levels is ranked on a scale of 1 to 5, with 1 being the most vulnerable and 5 the most secure. Williams combleaf was ranked 2 at all levels, indicating that this species is believed to be imperiled due to rarity and/or other factors causing the species to be vulnerable to extinction (Morefield 2000). While the Heritage Program rankings provide no legal protection, the U.S. Fish and Wildlife Service (FWS) use these rankings to prioritize rare species conservation needs. Williams combleaf is currently considered by the FWS Reno Office to be one of the highest priorities in Nevada in terms of conservation needs.

State of Nevada Status: Williams combleaf is currently listed as critically endangered under Nevada Revised Statute (NRS) 527.270. State laws for critically endangered plant protection require a permit to be issued by the State Forester prior to removal or destruction of plants on any lands in Nevada. A permit has never been requested or issued for Williams combleaf.

Federal Status: Williams combleaf is one of more than 400 species named in a 1992 settlement agreement between the FWS and the Fund for Animals et al., requiring FWS to review the listing status of species regarded as Category 1 candidates. Category 1 formerly included species for which sufficient information on species vulnerability and threats was available to support a proposal to list those species as threatened or endangered under the Endangered Species Act of 1973, as amended. Under the terms of the settlement agreement, the FWS agreed to determine whether or not to list each of those species by September 1, 1996.

In February 1996 the FWS issued a revised list of candidate species, based on a review of scientific information available on these species (61 Federal Register 7595). Williams combleaf was determined not to be warranted for listing at that time in view of two factors: 1) the potential for locating additional populations and 2) Federal agency efforts to conserve the species (61 Fed Reg 7457).

Effective 24 March 1997, the BLM Nevada State Office and FWS Reno office entered into a Conservation Agreement addressing Williams combleaf populations in the Virginia Range, which if adhered to, would preclude formal listing of this plant.

## **III. POTENTIAL IMPACTS TO THE POPULATION**

This section describes land use practices and other factors with potential to adversely affect Williams combleaf and its habitat. The area in which the species occurs is subject to the multiple use mandates of public land management. Consequently, some historic and current uses of the area are possibly having

an adverse effect on the habitat. It is not possible to determine whether the low plant numbers observed in 1996 were attributable to poor habitat conditions or were the result of natural climatic fluctuations.

Sources of potential threats to the subspecies are described below.

#### Water Level Fluctuations

These have had, and will continue to have impacts on the number of existing plants, aside from all other impacts. Very high water levels decrease the amount of potential habitat available, while total dessication of the playas over an extended period could cause population extirpation.

Livestock Grazing: Williams combleaf habitat in the Virginia Range lies within the BLM's 15,389 acre Jumbo Allotment. Stocking levels are currently set at 164 cattle and 1883 domestic sheep, during the period May through August. There is no evidence that Williams combleaf is palatable to cattle or sheep. Trampling or erosion caused by heavy utilization on upland vegetation or the search for water may be threats to the population and should be examined. In 1996, approximately 60 cattle were present in the habitat of Williams combleaf in late July. Two of the four lakes were fairly full at the time, resulting in much-reduced available habitat (that would have been present in drier years). Livestock use was concentrated in the remaining area. Much of it was trampled by cattle, which had created well-defined trails along the lake shores. There were salt blocks placed at two of the four lakes, and evidence of hoof action and trampling were most prevalent near the salt blocks. It is possible that during years when water levels remain high, livestock use could be detrimental. In the past several years, salt blocks have been placed at least .5 mile from the edges of the playas, and livestock have been discouraged from using the area except for watering.

Recreation: Most of the lands in the Virginia Range are designated open for off-highway vehicle (OHV) use by the BLM. A two-track dirt road runs adjacent to the largest lake, directly through combleaf habitat. Spur roads lead to the other lakes. Currently there is no information on the extent and frequency of OHV use in this area, but there have been OHV tracks identified around and onto the lake beds, as well as evidence of camping (including trash) and bonfires.

#### **IV. CONSERVATION ACTIONS TO BE CARRIED OUT UNDER THE EXISTING CONSERVATION AGREEMENT**

The actions as listed in the Conservation Agreement will be highlighted here. Full details are found in the Conservation Agreement itself. Actions may be revised to include other land management agencies, address current conditions and additional populations.

The BLM shall develop and implement the following conservation actions:

1. In cooperation with FWS, develop a comprehensive monitoring program to assess the extent and level of factors affecting Williams combleaf populations. They are to be monitored 3 times per year; photo points established; protocols for assessing population trends established.
2. Ensure that existing and future land uses do not result in detrimental effects on Williams combleaf populations or habitat on public lands.
3. Ensure that salt blocks are not placed within the habitat of Williams combleaf. No salting within .5 mile is permitted; this stipulation is part of the terms and conditions of current grazing permittees who use the allotment.
4. Annually provide information on Williams combleaf distribution and vulnerability to all field personnel conducting management activities in the Virginia Range.
5. Continue to pursue potential actions which would result in protection of combleaf habitat not present on public land. This includes land exchanges. Under the currently far-advanced LaBorde exchange, the 40 acres containing the fourth playa would become public land.
6. Prepare an annual summary report and conduct an annual coordination meeting.

FWS shall develop and implement the following conservation actions:

1. Provide technical assistance in monitoring and other conservation activities.
2. Amend the existing Conservation Agreement or develop a new Conservation Agreement, as necessary,

The Conservation Agreement is good for a period of 5 years from the date of the last signature.

## **V. ACEC CRITERIA AND EVALUATION**

To be considered a potential ACEC and analyzed in land use plan alternatives, an area must meet the criteria of “relevance” and “importance” as established and defined in Title 43 of the Code of Federal Regulations (43 CFR) 1610.7-2. Also, to be designated an ACEC through the planning process, an area that is “relevant” and “important” must also require special management attention. A management prescription is considered to be “special” if it is unique to the area involved and includes terms and conditions specifically designed to protect the important and relevant value(s) occurring in that area.

### **A. Relevance**

There are four “relevance” criteria (1. Significant historic, cultural or scenic values; 2. Fish and wildlife

resource; 3. Natural process or system; 4. Natural hazards), and an area is “relevant” if it meets any one of the four. Williams combleaf locations meet the third criteria. The site in the Virginia Range is essential for the maintenance of Williams combleaf, and possibly the survival of this sensitive species. This habitat, which would be considered critical habitat if the combleaf was listed under the Endangered Species Act, is indivisibly associated with the natural processes that have created and maintained the site.

## **B. Importance**

There are five listed criteria in BLM Manual 1613-Areas of Critical Environmental Concern. The Williams combleaf and its habitat meet three of the five: 1. More than locally significant qualities which give it special worth; 2. Has qualities or circumstances that make it sensitive, unique, or vulnerable to adverse change; 3. Has been recognized as warranting protection in order to carry out the mandates of FLPMA-the Federal Land Policy and Management Act (1976). The FLPMA mandate requires that the BLM is charged with taking actions to prevent the ESA listing of species where possible.

The Williams combleaf well satisfies both the “relevance” and “importance criteria”. A nomination of Williams combleaf habitat is justified and should be carried into the Southern Washoe County Urban Interface Proposed Plan Amendment for analysis. The attached map outlines the area which should be designated, including adjacent private lands which may become public in the near future.

## **C. Special Management**

Currently, under the Conservation Agreement, livestock salting is not allowed within .5 mile of Williams combleaf habitat (and it is a term and condition of the current livestock permittees who run cattle and sheep in the allotment), and the area is signed to warn OHV users of the importance of the ephemeral lakes. These actions may not be adequate to protect the combleaf and its habitat from degradation to the point the FWS deems it necessary to list the combleaf. Therefore, additional protection measures in the form of fencing are recommended, as follows: fence the three ephemeral lakes that lie within (public) Section 16, Township 17 North, Range 20 East (Mount Diablo Base & Meridian) and the lake in the southwest 1/4 of the northwest 1/4 of Section 15 (same township and range as above) to exclude OHV and domestic livestock use, while leaving access to a part of one of the waters for livestock drinking. The recommendation is to fence just the immediate combleaf habitat and not the entire 40 acre parcels which are affected, and to leave what is called a “water gap” for livestock. Whether one lake has a water gap, or whether one entire lake, having the least number of Williams combleaf plants, is left open, must be determined by on-the-ground reconnaissance by a team including BLM and FWS personnel and the affected livestock permittees. The total acreage in sections 15 and 16, based on aliquot parts, is 480.

## VI. CONCLUSION

As the Williams combleaf and its habitat as discussed in the BLM-FWS Conservation Agreement exceeds minimum ACEC threshold criteria for both "relevance" and "importance", I recommend that this area be designated as a Potential Area of Critical Environmental Concern, and that this designation

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|--|---------------------|
| Submitted by: <u>William R. Brigham</u>      | <u>19 July 2000</u> |
| William R. Brigham, Wildlife Biologist       | Date                |
| Reviewed by: <u>Daniel Z. Jacquet</u>        | <u>7/24/00</u>      |
| Daniel Jacquet, AFM, Renewable Resources     | Date                |
| <u>Richard Conrad</u>                        | <u>7/25/00</u>      |
| Richard Conrad, AFM, Non-Renewable Resources | Date                |
| Approved by: <u>John O. Singlaub</u>         | <u>JUL 27 2000</u>  |
| John O. Singlaub, Manager                    | Date                |
| Carson City Field Office                     |                     |

and potential management needs be analyzed in the Southern Washoe County Urban Interface Proposed Plan Amendment.

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## **APPENDIX E**

VIRGINIA RANGE WILLIAMS COMBLEAF HABITAT AREA

CONSERVATION AGREEMENT



## CONSERVATION AGREEMENT

### Williams Combleaf (*Polyctenium williamsiae*)

#### I. PURPOSE

This Conservation Agreement (CA) has been developed to facilitate voluntary cooperation between the U.S. Fish and Wildlife Service (FWS) and the Bureau of Land Management (BLM), in providing long-term protection for Williams combleaf (*Polyctenium williamsiae*). Such protection will require: 1) Monitoring of species status trends and habitat quality, 2) removal of known threats, 3) education of field personnel and permittees, and 4) incorporation of species conservation measures into planning and management activities. This agreement identifies specific actions that are necessary to provide this type of protective management.

If successful, this CA should preclude the future need to list Williams combleaf as threatened or endangered under the Endangered Species Act of 1973, as amended (ESA). Should the terms of this CA not be accomplished, the FWS may, in the future, determine that listing under the ESA is necessary to provide long-term protection for the species.

#### II. INVOLVED PARTIES

- a) Bureau of Land Management  
Carson City District  
Hot Springs Road, Suit 300  
Carson City, Nevada 89706 (702) 885-0638

Bureau of Land Management  
Nevada State Office  
850 Harvard Way  
Reno, Nevada 89502 (702) 785-6400

- b) U.S. Fish and Wildlife Service  
Nevada State Office  
4600 Kietzke Lane, Suite C125  
Reno, Nevada 89502 (702) 784-5227

U.S. Fish and Wildlife Service  
Region 1 Office  
911 N.E. 111th Avenue  
Portland, Oregon 97232 (503) 231-6118

c) **AUTHORITY**

The authorities for these agencies to enter into this voluntary CA derives from the following: the Endangered Species Act of 1973, as amended; the Fish and Wildlife Act of 1956, as amended; the Fish and Wildlife Coordination Act of 1958, as amended; and the national interagency Memorandum of Understanding for the conservation of species tending towards listing, issued on January 25, 1994 (94-SMU058). BLM additionally provides for management of sensitive species through conservation management of the lands and ecosystems supporting them (BLM Manual 6840).

**IV. BACKGROUND AND CONSERVATION STATUS**

Heritage Program Rank: The conservation status of native United States species is periodically ranked by the network of affiliated State agency-based Natural Heritage Programs, using standardized methods developed by The Nature Conservancy (TNC). Status at state, national, and global (range wide) levels is ranked on a scale of 1 to 5, with 1 being the most vulnerable and 5 the most secure. Williams combleaf was most recently ranked 1 at all levels, indicating that this species is believed to be critically imperiled because of extreme rarity or due to other factors causing the species to be vulnerable to extinction (TNC 1994, Morefield 1995). While Heritage Program rankings provide no legal protection, the FWS and other management agencies use these rankings to prioritize rare species conservation needs. Williams combleaf is currently considered by the FWS Nevada State Office to be one of the highest priorities in Nevada in terms of conservation needs.

State of Nevada Status: Williams combleaf is currently listed as critically endangered under--Nevada Revised Statute (NRS) 527.270. State laws for critically endangered plant protection require a permit be issued by the state forester firewarden prior to removal or destruction of plants on any lands in Nevada. A pen-nit has never been requested or issued for Williams combleaf.

Federal Status: Williams combleaf is one of more than 400 species named in a 1992 settlement agreement between FWS and the Fund For Animals et al., requiring FWS to review the listing status of species regarded as Category I candidates. Category I formerly included species for which sufficient information on species vulnerability and threats was available to support a proposal to list these species as threatened or endangered. Under the terms of this settlement agreement, the FWS agreed to determine whether or not to list each of these species by September 1996.

In February 1996, the FWS issued a revised list of candidate species, based on a review of the scientific information available on these species (61 Federal Register 7595). Many species included in the Fund For Animals settlement agreement, including Williams combleaf, were removed from candidate status with publication of this list. For any species covered by the settlement agreement, the FWS was required to provide an explanation for the reclassification in the Federal Register. Williams combleaf was determined to be not warranted for listing at that time in view of two factors: 1) The potential for locating additional populations and 2) Federal agency efforts to conserve the species (61 ER 7457). Such efforts include development and implementation of this CA (FWS 1995).

Federal candidate lists historically provided a means to identify one category of BLM Special Status Species. In March 1996, BLM's Nevada State Office released interim guidance incorporating all former candidates into the BLM Nevada Sensitive Species List so as to provide the same level of protection and consideration as was previously in effect (BLM Instruction Memorandum No. NV-96-019, March 20, 1996). BLM Special Status Species Management policy (BLM Manual 6840) is intended to ensure that actions authorized, funded, or carried out by BLM do not contribute to the need to list species as threatened or endangered.

## V. STATUS AND DISTRIBUTION OF THE SPECIES

*Polycytenium* is a small genus in the mustard family (Brassicaceae), consisting of two species: *P. fremontii* (which includes three varieties), and *P. williamsiae*. Both species are restricted in distribution to the western United States. Representatives from both species, including two of the three varieties of *P.f. fremontii* (Fremont's combleaf (*P. f. fremontii*) and crowded combleaf [*P. f. confertum*]) occur in Nevada. The third variety *P. f. bisulcatum* is restricted to parts of eastern Oregon.

In addition to Williams combleaf, crowded combleaf (*P.f. fremontii* var. *confertum*) is also of possible conservation interest. At the present time, this rare taxon is currently verified from just three locations on the western edge of the Great Basin Desert, in Mono County, California, and Douglas and Lyon counties, Nevada.

Status surveys for Williams combleaf during the period 1992 through 1995 documented 16 new sites (at 5 generalized locations) for either Williams combleaf or crowded combleaf. Williams combleaf is similar in appearance to crowded combleaf, making identification in the field difficult. In addition, both taxa have very similar habitat requirements. Both occur along the margins of ephemeral lakes, in the pinyonjuniper/sagebrush zone (Holland 1995).

Pending the outcome of taxonomic evaluations currently in progress, plants at these sites may be determined to be either Williams combleaf or crowded combleaf. Once the taxonomic evaluation is complete, FWS will assess the status of these newly identified populations of combleaf, and, depending on levels of threats to these taxa, may decide to include additional populations of combleaf in a subsequent CA. This CA could thus eventually include BLM's Battle Mountain District, Bishop Resource Area, and the Toiyabe and Inyo national forests.

Williams combleaf is currently verified only from the foothills of the Virginia Range east of Little Washoe Lake ((Washoe County, Nevada). It was first collected from this location in 1982, and described as a new species in 1983 (Rollins 1983, Rollins 1993, Tiehm 1996). Williams combleaf occurs along the sandy clay margins and bottoms of small ephemeral lakes in sagebrush scrub vegetation. The plant occurs mostly within the Sagoupe Variant soil series, which extends from the outer edge of the lake beds to the extreme high water line (TNC 1993). Yearly fluctuations in precipitation result in a highly variable water regime in these habitats, causing minor shifts in plant distribution. In general, Williams combleaf resides within a zone between the barren pool bottoms and upland vegetation, where it occurs in association with big sagebrush (*Artemisia tridentata*).

This population of Williams combleaf consists of three or four small sub-populations associated with four small ephemeral lakes. These lakes are generally covered with shallow water during periods of runoff, which may persist for extended periods following wet winters. These lakes are located within 0.25 to 0.50 miles of each other, at elevations ranging between 5,670 and 5,760 feet (Knight 1990, TNC 1993, NVNHP 1995).

Plant numbers along the shorelines of these ephemeral lakes fluctuate from year to year. For example, numbers were estimated to be less than 50 individuals in 1987, 3,000-5,000 in 1990, more than 4,000 in 1992, 1,180 in 1994, and 41 in 1996 (Knight 1990, TNC 1993, NVNHP 1995, Bair 1996). It is likely that these population fluctuations are attributable to the variable precipitation of the region, which causes these lakes to fill completely in some years, and only partially in others.

The Virginia Range population of Williams combleaf occurs within the BLM's Carson City District. Resource management decisions, actions, and guidance applicable to the Williams combleaf and its habitat were most recently

summarized in the 1987 Management Decisions Summary for the Lahontan Resource Area (BLM 1987). However, this document does not directly address resource management of Williams combleaf. A small portion of the habitat (one of the four ephemeral lakes) occurs on unfenced, unposted private lands.

## **VI. PROBLEMS FACING THE SPECIES**

This section describes land use practices and other factors with potential to adversely affect Williams combleaf and its habitat. The area in which the species occurs is subject to the multiple use mandates of public land management. Consequently, some historic and current uses of the area are possibly having an adverse effect on the habitat. Since a monitoring program has never been established for Williams combleaf, it is currently impossible to determine whether the 1996 low plant numbers are attributable to poor habitat conditions or are the result of natural climatic fluctuations. Sources of potential threats to the species are described here.

Livestock Grazing Williams combleaf habitat in the Virginia Range is included within the BLM's 15,389-acre Jumbo Allotment. Stocking levels are currently set at 164 cattle and 1883 sheep, during the period May through August. There is no evidence that Williams combleaf is palatable to cattle or sheep. Trampling or erosion caused by overgrazing may be threats to this species and need to be examined.

In 1996, approximately 60 cattle were present in the habitat of Williams combleaf in late July. Two of the four lakes were fairly full at this time. As a result, available habitat area was much reduced from what would have been available in drier years, and livestock use was concentrated in the remaining area. Much of the area was trampled by cattle, and well defined trails were visible along the lake shores. At two of the four lakes, salt blocks had been placed, and evidence of hoof action and trampling was most prevalent in these areas. It is possible that during years when lake water levels remain high throughout the season, that livestock occurrence in the habitat could be detrimental to the species.

Recreation Most of the public lands in the Virginia Range are designated open for off-highway vehicle (OHV) use. A two-track dirt road runs adjacent to the largest lake, and directly through combleaf habitat. Spur roads lead to the other lakes. Currently, there is no information on the extent and frequency of road use for OHV recreation in this area, however, there is evidence of OHV intrusions onto the lake beds.

Checkerboard Land Status: Land ownership in the Jumbo Allotment area consists of scattered parcels of public land interspersed with private lands. This pattern of ownership complicates management planning and regulation of land use practices in the Williams combleaf habitat area. FILM is in the preliminary stages of examining a potential land exchange which might result in acquisition of combleaf habitat not presently on public land.

## **VII. CONSERVATION ACTIONS THAT WILL BE CARRIED OUT**

This section outlines the conservation actions that will be undertaken by the BLM and FWS to ensure protection of the populations and habitat of the Williams combleaf on lands under BLM management authority. This CA may be amended in the future through modification of these conservation actions, or development and implementation of additional conservation actions, if new information indicates the need for increased levels of protective management.

It should be noted that ephemeral lakes such as those found in association with Williams combleaf populations provide important feeding and watering habitat for shorebirds, waterfowl, upland game birds, and mammals, including mule deer. Conservation actions implemented for the protection of Williams combleaf should also provide protection for these important wildlife habitats.

BLM shall develop and implement the following conservation actions:

1. **In cooperation with FWS, develop a comprehensive monitoring program to assess the extent and level of factors affecting Williams combleaf populations.** The program will be developed early in fiscal year 1997 and initially implemented during the 1997growing season. It will include protocol for assessment of population trends (declines, increases, or stability), and determination of causes, either natural or non-natural, for such trends. Monitoring methods will be determined in cooperation with FWS and local species experts. Monitoring will also include establishment of photo points and at least three site visits per year (Spring, Summer, and Fall) to document habitat conditions and assess the need to modify management practices in the area. A Nevada-Native Species Site Survey Report will be completed during each spot check visit. Copies will be provided to the FWS and Nevada Natural Heritage Program.
2. **Ensure that existing and future land uses do not result in detrimental effects on Williams combleaf populations or habitats on public lands.** This conservation action will be based on the results of the comprehensive monitoring program. It will include incorporating Williams combleaf conservation into future planning activities and use authorizations in accordance with BLM policy for sensitive species.
3. **Ensure that salt blocks are not placed within the habitat of Williams combleaf.** This action will be accomplished through terms and conditions attached to grazing permits. No salting within one-half mile of Williams combleaf habitat will be permitted.
4. **Annually provide information on Williams combleaf distribution and vulnerability to all field personnel conducting management activities in the Virginia Range.** This conservation action will include dissemination of information on Williams combleaf, and, appropriate training, as needed, to ensure that BLM activities do not lead to a decline or loss of Williams combleaf populations or disturbance of its habitat.
5. **Continue to pursue potential actions which would result in protection of combleaf habitat not presently on public land.** This conservation action will include discussion and coordination with the owner of the private inholding regarding possible land exchange, conservation easement, or conservation agreement, as well as development of long-term strategies for protective management in the Virginia Range through coordination with other land owners in the Jumbo Allotment area.
6. **Prepare an annual summary report and conduct an annual coordination meeting.** The report, not to exceed two pages, will be submitted to FWS at the end of each calendar year, and will provide 1) an overview of conservation actions undertaken and problems encountered in implementing the terms of the CA, and 2) recommendations for continued implementation of the CA. The meeting, which will include FWS and other interested parties, will provide the basis for modifying this CA, as necessary, to provide for continued protective management of Williams combleaf.

FWS shall develop and implement the following conservation actions:

1. **Provide technical assistance in monitoring and other conservation activities.** Such technical assistance will be cooperative in nature and should ensure that adequate protection and management of Williams combleaf occurs over the course of this CA.

2. **Amend the existing CA, or develop a new CA, as necessary.** The need to amend or replace the CA will be predicated on the final results and peer review of the taxonomic evaluation of other *Polycytenium* populations preliminarily identified as either Williams or crowded combleaf. The results of this evaluation should become available in 1997. The FWS will confer with experts to reach concurrence on the outcome of the taxonomic evaluation. Additional changes to the CA may also become necessary as a result of factors determined through monitoring, or changes in land management in the Virginia Range.

## **VIII. DURATION OF AGREEMENT**

The duration of this CA is for 5 years following the date of the last signature. If some portion of this CA cannot be carried out or if cancellation is desired, the party requesting such action will notify the other party within 1 month of the changed circumstances. At the end of 5 years, this CA will terminate. A new CA must be developed at that time, if both parties agree that a need for further actions still exists.

When or if it becomes known that there are threats to the survival of the Williams combleaf which are not or cannot be resolved through this or any CA, FWS may initiate actions to list this species under Section 4 of the Endangered Species Act through either a proposed rule or an emergency rule.

## **IX. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE**

Signing of this CA is covered under authorities outlined in Section III listed above. NEPA compliance for surveys and monitoring in accordance with this CA should be satisfied under existing approved BLM land use and management plans. However, all conservation actions included within this CA will be reviewed prior to implementation for compliance with NEPA regulations, and all required NEPA compliance will be achieved, as determined necessary, prior to implementation of individual actions.

## **X. LITERATURE CITED**

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XI. SIGNATURES

U.S. DEPARTMENT OF INTERIOR  
FISH AND WILDLIFE SERVICE

BY



TITLE

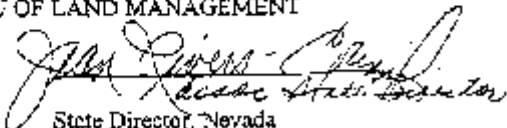
Regional Director, Region 1

DATE

4/2/97

U.S. DEPARTMENT OF INTERIOR  
BUREAU OF LAND MANAGEMENT

BY

  
Nevada State Director

TITLE

State Director, Nevada

DATE

24 March 1997

## **APPENDIX F**

### **LAND DISPOSAL LEGAL DESCRIPTIONS**

The following described public lands meet one or more of the disposal criteria under section 203 of the Federal Land Policy and Management Act of 1976, as amended. The lands are shown on Map 2.

T. 22 N., R. 19 E.,  
sec. 14, SE<sup>1</sup>/<sub>4</sub>SW<sup>1</sup>/<sub>4</sub>.

T. 22 N., R. 21 E.,  
sec. 7, lot 5.

T. 21 N., R. 20 E.,  
sec. 12, lots 1 and 2;  
sec. 15, lots 3-5 inclusive, W<sup>1</sup>/<sub>2</sub>W<sup>1</sup>/<sub>2</sub>NE<sup>1</sup>/<sub>4</sub>, E<sup>1</sup>/<sub>2</sub>SE<sup>1</sup>/<sub>4</sub>NW<sup>1</sup>/<sub>4</sub>, and NE<sup>1</sup>/<sub>4</sub>SW<sup>1</sup>/<sub>4</sub>.

T. 21 N., R. 21 E.,  
sec. 6, lot 7, SE<sup>1</sup>/<sub>4</sub>SW<sup>1</sup>/<sub>4</sub>;  
sec. 7, lot 1, NE<sup>1</sup>/<sub>4</sub>NW<sup>1</sup>/<sub>4</sub>

T. 20 N., R. 19 E.,  
sec. 24, lots 1, 4-8 inclusive, W<sup>1</sup>/<sub>2</sub>NE<sup>1</sup>/<sub>4</sub>, E<sup>1</sup>/<sub>2</sub>SW<sup>1</sup>/<sub>4</sub>, and W<sup>1</sup>/<sub>2</sub>SE<sup>1</sup>/<sub>4</sub>.

T. 20 N., R. 20 E.,  
sec. 8, lot 1;  
sec. 14, lots 3, 14 - 90 and SW<sup>1</sup>/<sub>4</sub>NE<sup>1</sup>/<sub>4</sub>.

T. 19 N., R. 21 E.,  
sec. 8, lots 1-4 inclusive;  
sec. 16, NE<sup>1</sup>/<sub>4</sub>, N<sup>1</sup>/<sub>2</sub>NW<sup>1</sup>/<sub>4</sub>, and SE<sup>1</sup>/<sub>4</sub>NW<sup>1</sup>/<sub>4</sub>;  
sec. 18, lot 1 and N<sup>1</sup>/<sub>2</sub>NE<sup>1</sup>/<sub>4</sub>.

T. 18 N., R. 20 E.,  
sec. 34, E<sup>1</sup>/<sub>2</sub>NW<sup>1</sup>/<sub>4</sub>SE<sup>1</sup>/<sub>4</sub>NE<sup>1</sup>/<sub>4</sub>, S<sup>1</sup>/<sub>2</sub>SE<sup>1</sup>/<sub>4</sub>NE<sup>1</sup>/<sub>4</sub>, E<sup>1</sup>/<sub>2</sub>NW<sup>1</sup>/<sub>4</sub>SW<sup>1</sup>/<sub>4</sub>NW<sup>1</sup>/<sub>4</sub>, W<sup>1</sup>/<sub>2</sub>SE<sup>1</sup>/<sub>4</sub>SW<sup>1</sup>/<sub>4</sub>NW<sup>1</sup>/<sub>4</sub>,  
N<sup>1</sup>/<sub>2</sub>N<sup>1</sup>/<sub>2</sub>NE<sup>1</sup>/<sub>4</sub>SE<sup>1</sup>/<sub>4</sub>, N<sup>1</sup>/<sub>2</sub>SW<sup>1</sup>/<sub>4</sub>NE<sup>1</sup>/<sub>4</sub>SE<sup>1</sup>/<sub>4</sub>, S<sup>1</sup>/<sub>2</sub>SE<sup>1</sup>/<sub>4</sub>NE<sup>1</sup>/<sub>4</sub>SE<sup>1</sup>/<sub>4</sub>, W<sup>1</sup>/<sub>2</sub>SW<sup>1</sup>/<sub>4</sub>SW<sup>1</sup>/<sub>4</sub>SE<sup>1</sup>/<sub>4</sub>,  
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S<sup>1</sup>/<sub>2</sub>SE<sup>1</sup>/<sub>4</sub>SE<sup>1</sup>/<sub>4</sub>SE<sup>1</sup>/<sub>4</sub>.

T. 17 N., R. 20 E.,  
sec. 18, E<sup>1</sup>/<sub>2</sub>NE<sup>1</sup>/<sub>4</sub>SW<sup>1</sup>/<sub>4</sub>, and NE<sup>1</sup>/<sub>4</sub>SE<sup>1</sup>/<sub>4</sub>SW<sup>1</sup>/<sub>4</sub>.

## **APPENDIX G**

### **PROTEST PROCEDURES**

## **Protest Procedures**

This resource management plan amendment may be protested by any person who participated in the planning process and who has an interest which is or may be adversely affected by the approval of the plan amendment. A protest may raise only those issues which were submitted for the record during the planning process (see 43 Code of Federal Regulations 1610.5-2).

Protests must be filed with:

Director, Bureau of Land Management, Resource Planning Team (WO-480)  
1849 C St., NW, Washington, D.C. 20035

All protests must be written and must be postmarked on or before **MARCH 1, 2001** and should contain the following information:

The name, mailing address, telephone number and interest of the person filing the protest.

A statement of the issue or issues being protested.

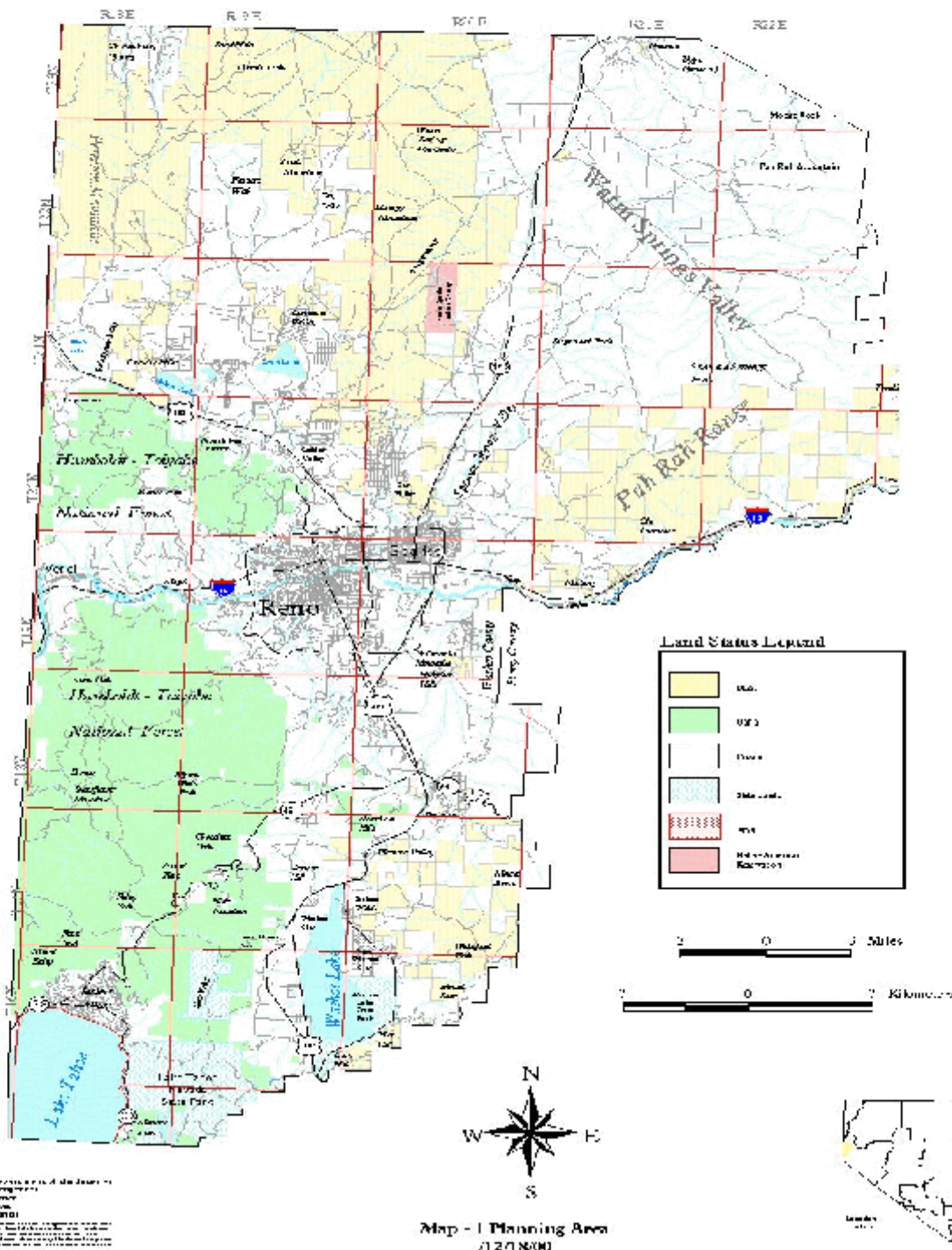
A statement of the part or parts of the document being protested.

A copy of all documents addressing the issue or issues previously submitted during the planning process by the protesting party, or an indication of the date the issue or issues were discussed for the records.

A short, concise statement explaining precisely why the Bureau of Land Management's Nevada State Director's decision is wrong.

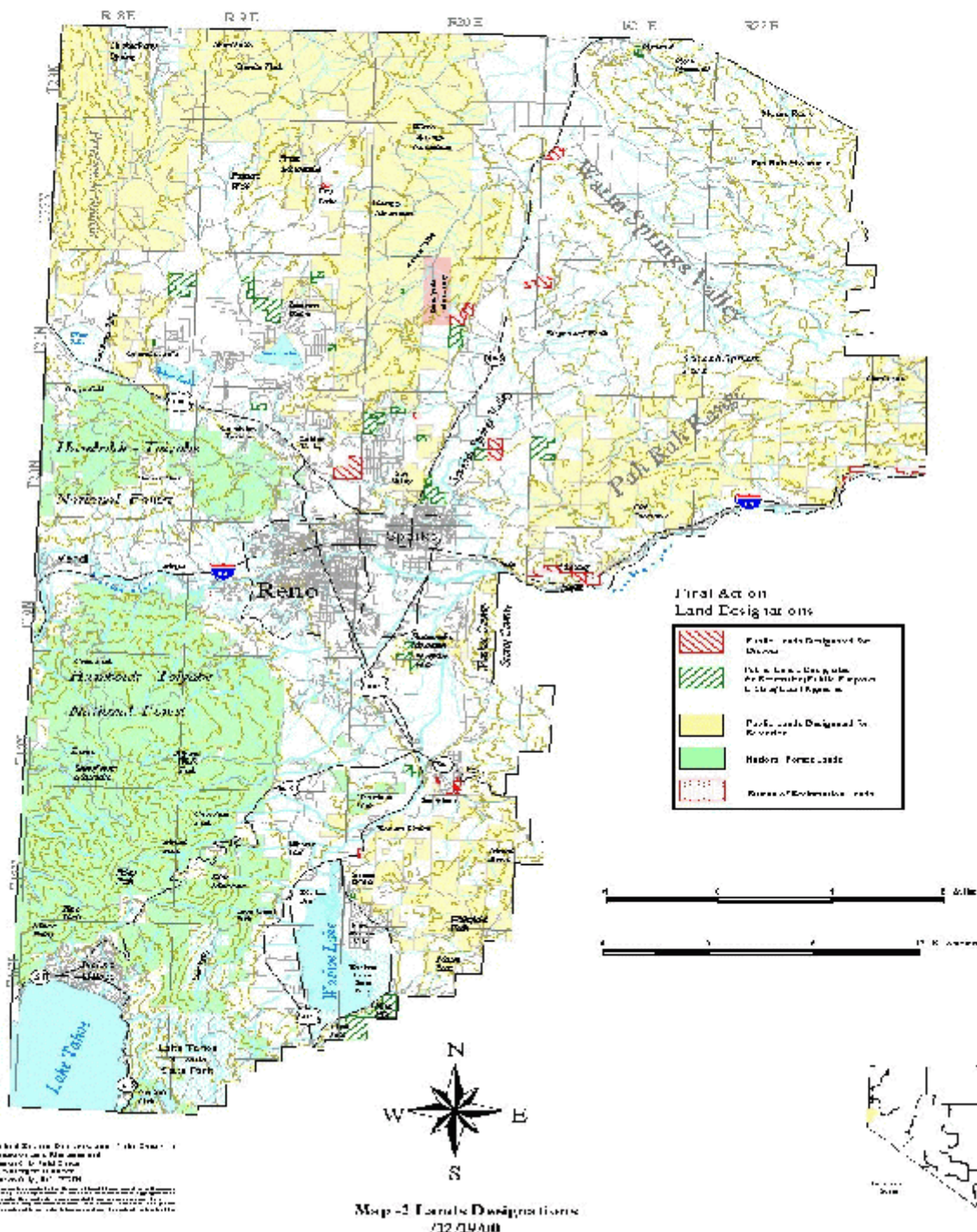


## Final Southern Washoe County Urban Interface Plan Amendment





## Final Southern Washoe County Urban Interface Plan Amendment

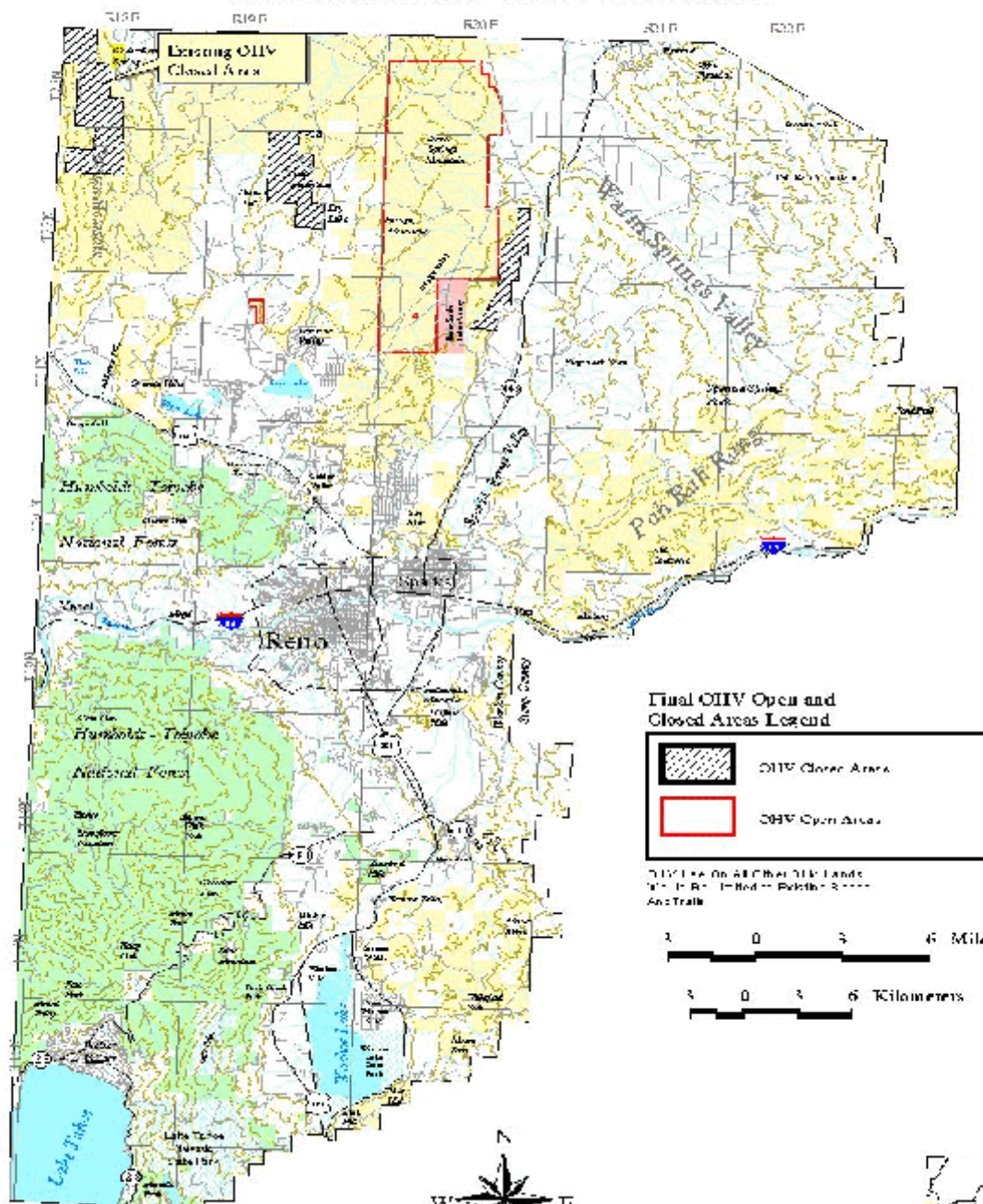








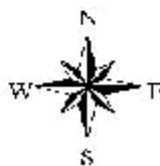
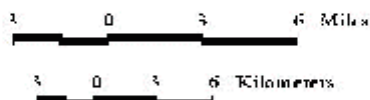
## Final Southern Washoe County Urban Interface Plan Amendment



### Final UIP Open and Closed Areas Legend



UIP is on all other UIP lands  
UIP is on all other UIP lands  
Any Trail



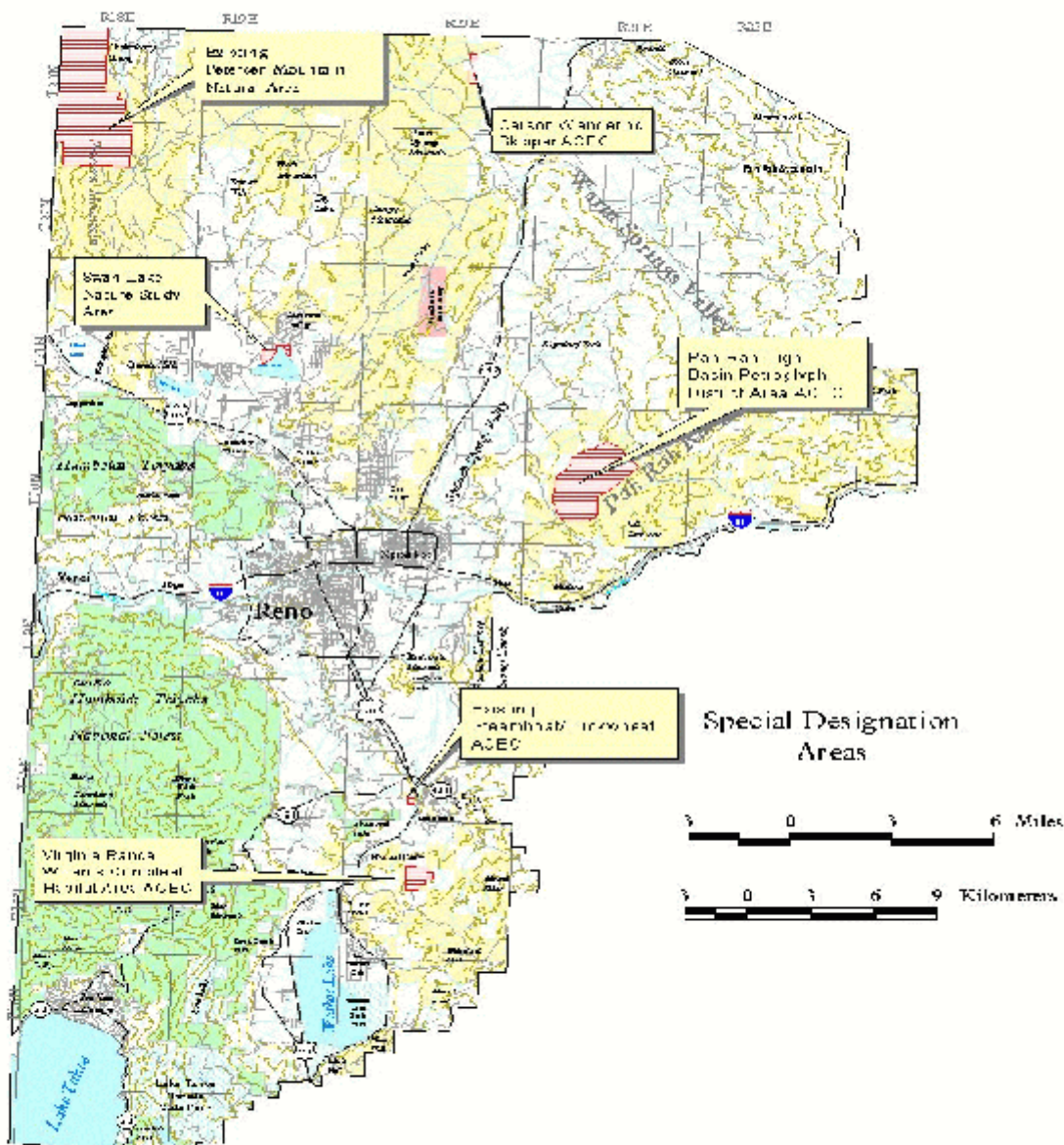
Map - 4 UIP Designations  
12/18/00







## Final Southern Washoe County Urban Interface Plan Amendment



This map is a representation of the information provided by the Nevada Department of Transportation. It is not a guarantee of accuracy. The information is provided for informational purposes only. The user assumes all responsibility for the use of this information. The information is not to be used for any purpose other than that for which it was intended. The information is not to be used for any purpose other than that for which it was intended.



Map - 5 Special Designation Areas  
12/18/00

